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DRAFT

# **Environmental Assessment for the Disposition of Hangars 113, 114, 115 Naval Air Station Jacksonville, Duval County, Florida**

November 2013



Abstract: This Environmental Assessment analyzes the environmental impacts of demolishing three hangars aboard NAS Jacksonville. The buildings have been determined eligible for the National Register of Historic Places and demolition would constitute an adverse effect under the National Historic Preservation Act. The Navy executed an Memorandum of Agreement to mitigate the impacts consequent to demolition on xxxxx. Little or no other environmental effects are expected from the Proposed Action

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## Executive Summary

The United States (U.S.) Department of the Navy (Navy) has prepared this Environmental Assessment (EA) to identify and evaluate the potential environmental effects that may result from a decision on the disposition of Hangars 113, 114, 115 at Naval Air Station (NAS) Jacksonville, in Jacksonville, Florida. This EA was prepared in accordance with the National Environmental Policy Act (NEPA) of 1969, codified under 42 United States Code (USC) §4321 et seq. and the President's Council on Environmental Quality regulations implementing NEPA in 40 Code of Federal Regulations (CFR), Parts 1500-1508. This document was also prepared in accordance with Navy NEPA regulations, which are in 32 CFR Part 775 and Chief of Naval Operations Instruction (OPNAVINST) 5090.1C, Navy Environmental and Natural Resources Program Manual. This EA focuses mainly on the analysis of impacts to historical resources since there are little or no other environmental effects associated with the proposed action.

The purpose of the proposed action is to eliminate tower visibility and vertical obstruction problems created by hangars 113, 114, 115 at NAS Jacksonville. The action warrants an Environmental Assessment because these buildings are eligible for listing in the National Register of Historic Places and demolition, if selected, is considered an adverse effect.

Prospective alternatives explored in depth are a 'no action' alternative to retain the buildings as is, and demolition of the buildings, which is the only feasible alternative that addresses the visibility and vertical obstruction problems. Beyond these two alternatives, rehabilitation (partial and full) of the buildings, reconstruction/replacement, relocation of the buildings to another location, and mothballing them (which includes enclosing the buildings to make it secure and weather-tight and adding ventilation to protect the buildings from mold and mildew) were considered and are documented in the Economic Analysis report prepared by Crystal Clear Maintenance Inc. which was completed in October 2013 and attached as Appendix D to this EA. These latter alternatives were considered, but are not feasible because they do not abate the safety concerns and violations of the regulations and were therefore eliminated from analysis in the EA.

Other than cultural resources environmental effects little or no other environmental effects are anticipated from the action. The mitigation efforts determined necessary consequent to a decision to demolish the buildings is the result of consultation with the Florida State Historic Preservation Officer (SHPO) and are memorialized in a Memorandum of Agreement (MOA) (Appendix C) executed between the Navy and the Florida SHPO on //date to be entered when acquired//.

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## Acronyms and Abbreviations

ADA.....	Americans with Disabilities Act
CFR.....	Code of Federal Regulations
CNRSE.....	Commander, Navy Region Southeast
DON .....	Department of the Navy
EA.....	Environmental Assessment
EPA.....	Environmental Protection Agency
HAZWOPER .....	Hazardous Waste Operations and Emergency Response
MOA .....	Memorandum of Agreement
NAS.....	Naval Air Station
NAVFAC.....	Naval Facilities Engineering Command
NAVFAC SE .....	Naval Facilities Engineering Command Southeast
NEPA .....	National Environmental Policy Act
NHPA.....	National Historic Preservation Act
NPDES.....	National Pollutant Discharge Elimination System
OPNAVINST .....	Chief of Naval Operations Instruction
PSC.....	Potential Source of Contamination
SEIS.....	Supplemental Environmental Impact Statement
SHPO .....	State Historic Preservation Officer
UFC.....	Unified Facility Criteria
U.S.....	United States
USC.....	United States Code

## 1.0 Introduction

This Environmental Assessment (EA) evaluates the environmental effects of the alternatives for the disposition of Hangars 113, 114, and 115, Naval Air Station (NAS) Jacksonville (see Figures 1.1 and 1.2). This EA was prepared in accordance with the National Environmental Policy Act (NEPA) of 1969, codified under 42 United States Code (USC) §4321 et seq. and the President’s Council on Environmental Quality regulations implementing NEPA in 40 Code of Federal Regulations (CFR), Parts 1500-1508. This document was also prepared in accordance with Navy NEPA regulations, which are in 32 CFR Part 775 and Chief of Naval Operations Instruction (OPNAVINST) 5090.1C, Navy Environmental and Natural Resources Program Manual. This EA focuses mainly on the analysis of impacts to cultural resources since there are little or no other environmental effects associated with the proposed action.

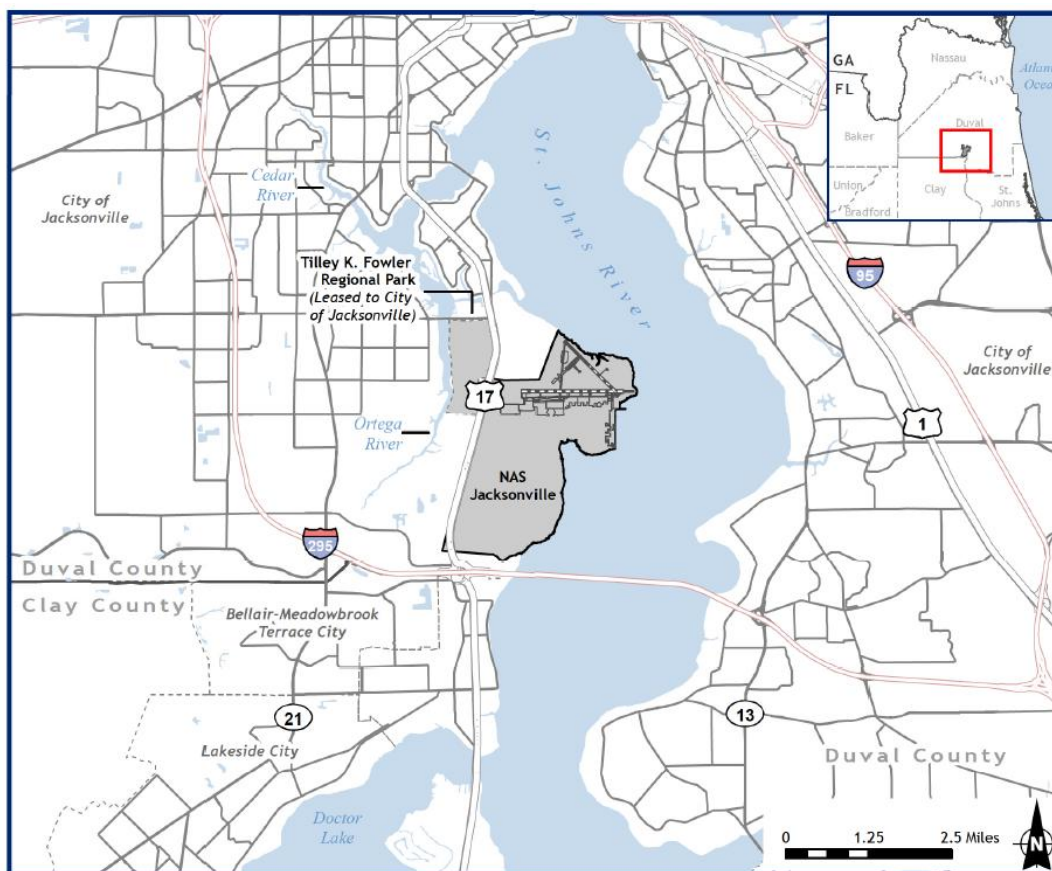
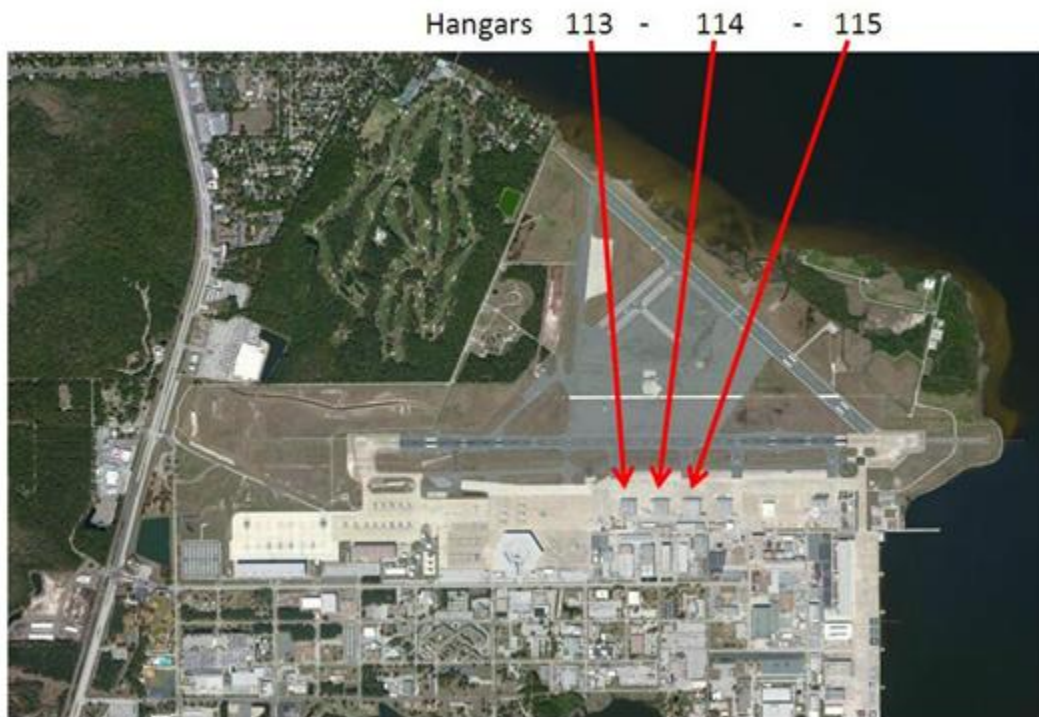


Figure 1-1: Regional Map

World War II-era Hangars 113, 114, and 115, located at NAS Jacksonville are part of the Landplane Hangar Historic District, which has been determined eligible for the National Register of Historic Places under Criterion A (associated with events that have made a significant contribution to the broad patterns of our history) for its association with World War II Naval

aviation history, and Criterion C (embodies the distinctive characteristics of a type, period or method of construction, or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components may lack individual distinction) for its architecture as designed by Albert Kahn, a nationally-significant industrial architect. An Environmental Assessment is needed because these buildings are eligible for listing in the National Register of Historic Places and demolition, if selected, is considered an adverse effect under Section 106 of the National Historic Preservation Act (NHPA).



**Figure 1-2: Location of Hangars 113, 114, 115 at NAS Jacksonville**

Hangars 113, 114, and 115 were built in 1941. Over subsequent decades the overall flying mission at NAS Jacksonville has significantly changed and, even within the last 12 years, the base has experienced the elimination of carrier deploying fixed wing units, an increase in the number of P-3 squadrons, the departure of the SH-3 helicopter, and the arrival of MH-60R, C-130, C-40 and P-8A aircraft. The P-8A aircraft is now the controlling aircraft at NAS Jacksonville replacing the P-3 aircraft as the default standard model by which infrastructure decisions are made.

Hangars 113, 114, and 115 were by design too narrow, and their doors too low, for large aircraft like the P-3 and P-8. To make the best effort to accommodate the P-3 in at least one of these hangars, NAS Jacksonville cut the center vertical supports out of Hangar 114 (necessitating load bearing trusses on its roof) to provide adequate lateral clearance. Vertical clearance into and out of the hangar by a P-3 requires that the aircraft has to have its nose elevated (tipping the tail



down) when the tail needs to clear the door archway, a labor and time consuming process. The P-8A is approximately 18 feet wider and 8 feet taller than the P-3C. As noted above, Hangars 113 and 115 cannot accommodate the aircraft widthwise; none of the hangars can accommodate its height, rendering them now incapable of supporting NAS Jacksonville's primary airfield mission. Additionally, the taxi weight of the P-8A is approximately 189,000 pounds. This weight is not supportable by the hangars' 113, 114, 115 floor (slab) which would have to be totally demolished and re-constructed to accommodate this higher weight load.

## **1.1 Proposed Action**

The proposed action is to eliminate tower visibility and vertical obstruction problems created by hangars 113, 114, 115 at NAS Jacksonville.

## **1.2 Purpose and Need for Action**

The purpose of the proposed action is to resolve violations of Navy and DOD regulations for aviation facilities with regard to visibility of taxiways and parking areas from the tower, and vertical obstructions adjacent to the runway. The action is needed because, due to their location, Hangars 113, 114, and 115 are in violation of Navy and DOD regulations concerning both visibility of taxiways and ramp areas from the tower and height restrictions on structures adjacent to runways.

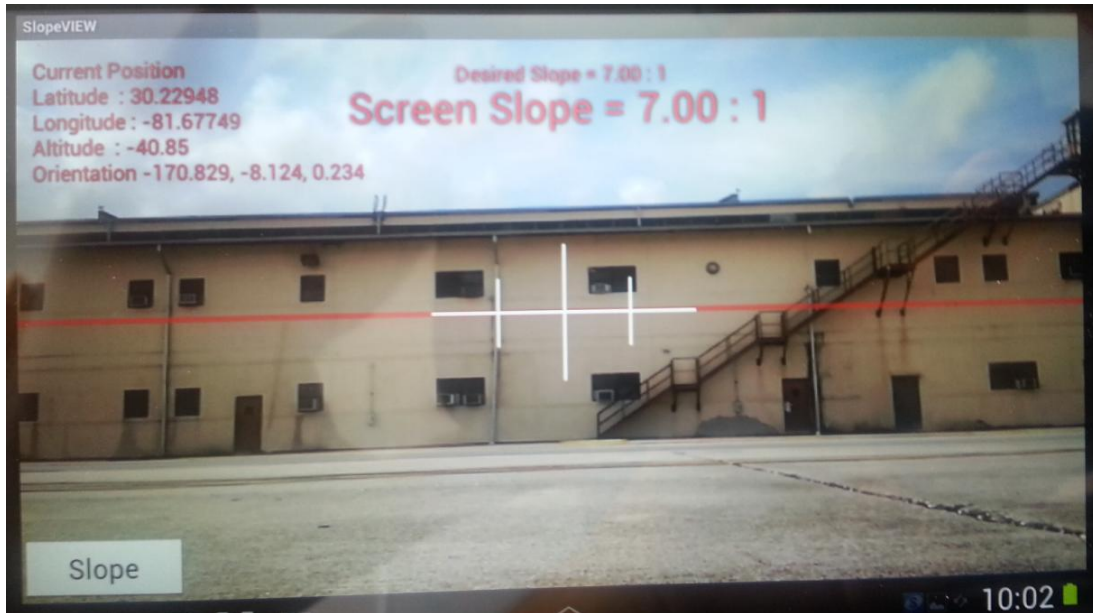
## **1.3 Scoping, Agency Coordination, and Public Involvement**

Agency scoping letters describing the proposed action were sent to the Florida State Clearinghouse for dissemination to interested state agencies, such as the State Historic Preservation Office, and to the Environmental Protection Agency (EPA), to solicit their comments and input. No interest is expected from any other federal agencies, such as the U.S. Fish and Wildlife Service, National Marine Fisheries Service, or the U.S. Army Corps of Engineers, so no scoping letters were sent to those agencies. The responses from the Florida State Clearinghouse and the EPA are in Appendix A. Consistent with the NHPA the Navy has also contacted the Jacksonville Historical Society regarding the possible demolition of hangars 113, 114, and 115. A copy of their response is in Appendix A.

## 2.0 Proposed Action and Alternatives

### 2.1 Description of Proposed Action

The proposed action is to eliminate tower visibility and vertical obstruction problems created by hangars 113, 114, 115 at NAS Jacksonville. Hangars 113, 114 and 115 at NAS Jacksonville are being considered for potential planning actions due to two primary reasons, both related to safety:



**Figure 2-1: Slope Intersection with Hangar 113 (114 and 115 similar).  
Crosshair and red line indicate maximum height of objects from  
perspective of nearest clear zone boundary.**

1) Non-Compliance with current safety criteria for vertical clearance due to their height and existing location (Fig 2-1). Specifically, hangars 113, 114 and 115 violate Airfield Safety Clearance Requirements in accordance with Appendix E of the NAVFAC P-80.3 and the Unified Facility Criteria 3-260-01, Airfield and Heliport Planning and Design which require a 7 to 1 glide slope clearance from the edge of the Primary Clear Zone, which is 750' from the runway centerline for NAS Jacksonville. This is to minimize potential aircraft collision risk with above ground structures.

2) Hangars 113, 114 and 115 obstruct NAS Jacksonville's Air Traffic Controllers view of the airfield movement area (see Figure 2-2 and 2-3) as required under UFC 3-260-01 Para B17-2.1. UFC 3-260-01 Para B17-2.1 states that "The air traffic controllers must have a clear,

Hangar 113, 114, 115



**Figure 2-2: View of Ramp/Taxiway Area to West from Tower**

Hangar 116



**Figure 2-3: Removal of Hangars 113, 114, and 115 increases visibility of ramp areas and taxiway (yellow indicates visual obstruction which would be removed)**

unobstructed, and direct view to all operating positions of the airport traffic area; to the approach end of the primary instrument runway; and all other active runways, taxiways, parking aprons, test pads, and similar areas." The present location of these noted hangars directly obstructs the view of virtually all aircraft primary movement & parking aprons to the west of hangar 116, and approximately 50% of primary taxiways from the visibility of Air Traffic Controllers, allowing for the high potential of aircraft collisions. Removal of hangars 113, 114 and 115 will improve

that significantly, a larger portion of the taxiway and ramp area north of hangars 1000, 30, and 511 would become visible.

## **2.2 Description of Alternatives**

Two alternatives were considered in detail:

### Alternative 1 (Demolish hangars 113, 114, and 115)

Alternative 1, which is the demolition of hangars 113, 114, and 115, is the preferred alternative. Demolition is the only feasible alternative which removes the vertical obstruction and improves visibility of the western ramp area and taxiways from the tower, thus meeting the purpose and need for the action. The waste material would be reused, recycled, or disposed of appropriately in an approved landfill, in accordance with all applicable rules and regulations. The space would be used for aircraft parking, less the area of the building slabs which would be cleared of rubble and seeded.

### Alternative 2 (“no action” alternative)

The evaluation of Alternative 2, the “no action” alternative, is required as a baseline for analysis by NEPA and Navy regulations and involves the Navy taking no action regarding the status of hangars 113, 114, and 115.

## **2.3 Alternatives considered but eliminated from further analysis**

Beyond these two alternatives, rehabilitation (partial and full) of the buildings, reconstruction/replacement, relocation of the buildings to another location, and mothballing them (which includes enclosing the buildings to make it secure and weather-tight and adding ventilation to protect the buildings from mold and mildew) were considered and are documented in the Economic Analysis report prepared by Crystal Clear Maintenance Inc. which was completed in October 2013 and attached as Appendix D to this EA. These latter alternatives were considered, but are not feasible because they do not abate the safety concerns and violations of the regulations and were therefore eliminated from analysis in the EA.

## **3.0 Affected Environment and Environmental Consequences**

### **3.1 Physical Environment and Consequences**

NAS Jacksonville is located in northeast Florida, on the west bank of the St. Johns River, about 30 miles from the Atlantic Ocean. Hangars 113, 114, 115 are located along the flight line, south of the main runway (10-28). Duval County, Florida, is in attainment for all National Ambient Air Quality Standard criteria, and neither a General Conformity Analysis nor record of Non-Conformity is required under the Clean Air Act.

Under Alternative 1 (Preferred Alternative), or Alternative 2 (No Action Alternative) there would be no expected effects on land or soil resources, air resources, water resources, or noise and sound. NAS Jacksonville operates under a Title V Air Permit (#0310215-042-AV, effective through May 31, 2014) and the Navy would require all contractors to comply with all parameters and conditions of this permit. Demolition, if selected, would be carried out consistent to the maximum extent practicable with best practices and no effects to Florida's Coastal Zone are reasonably anticipated as a result of the proposed action. By electronic mail dated **//date to be entered when acquired//**, the Florida State Clearinghouse concurred that the proposed activity is consistent with the Florida Coastal Management Program (Appendix A).

### **3.2 Facilities and Infrastructure and Consequences**

The area of NAS Jacksonville where hangars 113, 114, and 115 are located is almost entirely paved, and comprises an aircraft taxiway, aircraft parking areas, automobile parking areas, and roads. The unpaved areas between the runway and taxiway/aircraft parking area run parallel to the row of hangars, approximately 350 feet to the north.

Implementation of Alternative 1 (Demolish hangars 113, 114, and 115) would not cause more than a negligible effect on the station infrastructure as a whole, and the overall effect would be beneficial since the concerns with regard to aviation safety would be addressed appropriately. Implementation of Alternative 2 (No Action Alternative) would require allocation of resources and labor to prevent further degradation, including the corrosion already noted in the door tracks, which otherwise may present a safety concern to occupants.

### **3.3 Biological Environment and Consequences**

Hangars 113, 114, and 115 are located in a developed area, with no federally listed threatened or endangered species, or federally designated critical habitat, at the project site. The site is characterized by concrete paving with no natural foliage.

Because the project area is already developed, there are no anticipated effects to wildlife or any terrestrial habitat in the project area. The Navy has determined that implementation of Alternative 1 or 2 will have "no effect" on federally listed threatened or endangered species, and will not result in the destruction or adverse modification of federally designated critical habitat.

### **3.4 Aquatic Systems and Consequences**

Currently, storm water flow generated on and around the hangars is discharged into the St. Johns River through the Station's existing storm water drainage system. NAS Jacksonville operates under a base wide Section 402 National Pollutant Discharge Elimination System (NPDES) Permit (#FLR05A829MSGP, expiration date October 6, 2016) for storm water.

For Alternative 1 (Preferred Alternative), current plans call for the slabs of hangars 113, 114, and 115 to be broken up with a consequent diminishment in impermeable surface and consequently less storm water runoff generated, and more green space to allow for additional natural infiltration of storm water into the ground. With Alternative 2 (No Action Alternative) storm water would continue to be discharged directly into the St. Johns River through the Station's existing storm water drainage system; therefore, there would be no change.

### **3.5 Socioeconomic Environment and Consequences**

According to the City of Jacksonville Office of Economic Development, the total population of Jacksonville as of 2010 was 864,263, with a projected population in 2015 of 901,000, a 4.2% increase. The median age of the population was 35.8 years. The largest single category of industry in the city was educational and healthcare/social (19.5%), followed by retail trade (12.2%), professional/scientific/management/administrative (11.9%), finance/insurance/real estate (11.6%), and art/entertainment/recreations/accommodation/food service (11.5%). The average household income in Jacksonville in 2010 was \$63,055.

For Alternative 1 (Preferred Alternative) there would be a small beneficial socioeconomic effect by the hiring of contractors to complete the demolition activities associated with this alternative. The effects on the construction contractors and workers would be short-term, during the duration of the work. The work would also generate a small amount of tax revenue to benefit the state and local governments.

### **3.6 Environmental Justice and Protection of Children from Environmental Health Risks**

Executive Order (E.O.) 12898 (Federal Actions to Address Environmental Justice in Minority and Low Income Populations) mandates that federal agencies identify and address, as appropriate, disproportionately high and adverse human health or environmental effects of the programs on minority and low-income populations. Disproportionate environmental impact occurs when the risk or rate for a minority population or low-income population from exposure to an environmental hazard exceeds the risk or rate of the general population and, when available, to another appropriate comparison group. Because no adverse environmental effects are anticipated, and there are no dwellings within 1 mile, the proposed action and the no action alternative are not expected to have any adverse human health or environmental effects on minority or low income populations. E.O. 13045 (Protection of Children from Environmental Health Risks and Safety Risks) mandates that federal agencies identify and assess environmental health and safety risks that may disproportionately affect children as a result of the implementation of federal policies, programs, activities, and standards. Because the hangars are



distant from residences, schools, and other facilities for children, the proposed action and the alternatives are not expected to have any environmental health or safety risks that would disproportionately affect children.

### **3.7 Cultural Resources and Consequences**

Hangars 113, 114, and 115 are part of the Landplane Hangar Historic District, which has been determined eligible for the National Register of Historic Places under Criterion A for its association with World War II Naval aviation history, and Criterion C for their architecture as designed by Albert Kahn, a nationally-significant industrial architect.

Under Alternative 1 (Preferred Alternative), the demolition of hangars 113, 114, and 115, constitutes an adverse effect on cultural resources that are eligible for inclusion in the National Register of Historic Places. Section 106 of the NHPA requires a federal agency to consult with the SHPO when an undertaking, such as the proposed action, may affect a cultural resource that is listed in, or is eligible for inclusion in, the National Register of Historic Places. Part of the Navy's consultation with the Florida SHPO involves determining the appropriate actions to mitigate the adverse effect. These mitigation efforts are memorialized in a Memorandum of Agreement (MOA) (Appendix C) executed between the Navy and the Florida SHPO on xxxxxxxx, indicating that both parties formally agree to the level and extent of the specified mitigation actions to address the adverse effect on the cultural resource.

The stipulations described in the MOA are intended to mitigate the adverse effect by:

- 1)
- and
- 2)

Under Alternative 2 ('No Action' Alternative), hangars 113, 114, and 115 would not be demolished. They would require continued labor and resources for upkeep and maintenance while contributing little to the installation's mission.

### **3.8 Health and Safety and Consequences**

The Economic Analysis (Appendix D) contains a detailed inventory of the health and safety conditions of hangars 113, 114, and 115. Costs to renovate the World War II era buildings are substantial and contributed to in part by the presence of asbestos, outdated and degrading electrical systems, and non-Americans with Disabilities Act (ADA) compliant lavatories.

For Alternative 1 (Preferred Alternative), Alternative 2 ('No Action'), common construction zone workplace injuries could occur from accidents associated with the operation of heavy machinery during the execution of Alternative 1 (Preferred Alternative). The disposal of waste also introduces a minor safety risk with the possibility of accidents. These risks are minimal because the contractor will be required to implement proper safety protocols and procedures. This site is located directly north of a contaminated site in the Station's Installation Restoration Program: Potential Source of Contamination (PSC) 45, Building 200 Wash Rack. Contamination has been discovered in the parking lot between building 200 and hangars 114 and

115 and includes carbon tetrachloride. This contaminant is not associated with any known contaminant at Building 200 so a different source is suspected. That source may be the hangars. Old weathered fuel has also been discovered in front of hangar 114 between 114 and 200. This won't be a concern until the contractor removes the slab. HAZWOPER training under 29CFR 1910.120 will be required.

Under Alternative 2 (No Action Alternative) hangars 113, 114, and 115 would continue to violate visibility and flight safety standards as described in section 2.1.

### **3.9 Cumulative Effects**

A cumulative impact is defined in 40 CFR 1508.7 as “the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions, regardless of what agency (federal or non-federal) or person undertakes such other actions.”

The proposed action is expected to cause only small or negligible changes, if any, to the physical, biological, or socioeconomic environments at NAS Jacksonville. There have been no building removals in the recent past in the vicinity of these hangars, and there are none expected within the foreseeable future. Coincident with demolition, if selected, the base will be resurfacing (milling and overlay) the runway portion in front of the hangars. This will take place on the runway surface and have no impact in close proximity to the hangars. Therefore, no measurable cumulative impacts are anticipated with implementation of the proposed action.



## **4.0 Permits and Mitigation Measures**

### **4.1 Permits**

No federal or state permits would be necessary to complete the proposed action, but adherence to federal and state laws requires coordination with other agencies for construction, demolition, and operational elements of the proposed action.

### **4.2 Mitigation Measures**

As agreed to in the MOA //cite//

## 5.0 Summary

Alternative 1 (Proposed Action and preferred alternative) is a cost effective option which provides multiple benefits at the cost of the physical manifestation of historic buildings. The benefits of Alternative 1 (the preferred alternative) are: removal of 3 large buildings which are in violation of vertical height requirements for the main runway and removal of a substantial amount of the obstruction of view between the control tower and significant portions of the ramp in front of hangars 1000, 30, and 955.

Alternative 2 (No Action alternative) would retain three buildings that are both non-compliant with aviation safety standards and which cannot practicably support the P-3C nor support the P-8A or C-40 aircraft which will be the predominant types of fixed wing aircraft at NAS Jacksonville in the future.

The Navy has determined that implementation of Alternative 1 or 2 will have "no effect" on federally listed threatened or endangered species, and will not result in the destruction or adverse modification of federally designated critical habitat. There are no anticipated effects to wildlife or any terrestrial habitat in the project area. The proposed action is expected to cause only small or negligible changes, if any, to the physical, biological, or socioeconomic environments at NAS Jacksonville. Because the hangars are distant from residences, schools, and other facilities for children, the proposed action and the alternatives are not expected to have any environmental health or safety risks that would disproportionately affect children.

The mitigation efforts determined necessary consequent to a decision to demolish the buildings is the result of consultation with the Florida State Historic Preservation Officer (SHPO) and are memorialized in a Memorandum of Agreement (MOA) (Appendix C) executed between the Navy and the Florida SHPO on //date to be entered when acquired//.

## **6.0 List of Agencies and Persons Consulted**

Chief, National Environmental Policy Act Office  
Office of Policy & Management  
Environmental Protection Agency Region 4  
Atlanta Federal Center  
61 Forsyth Street, SW  
Atlanta, GA 30303-3104

Historic Preservation Specialist  
Advisory Council on Historic Preservation  
1100 Pennsylvania Avenue, NW, Suite 803  
Old Post Office Building  
Washington, DC 20004

Florida State Clearinghouse, Florida Department of Environmental  
Attn: Ms. Lauren P. Milligan  
3900 Commonwealth Blvd  
Mail Station 47  
Tallahassee, FL 32399

State Historic Preservation Officer  
Florida Department of State, Division of Historical Resources (SHPO)  
Division of Historical Resources  
R.A. Gray Bldg, 500 South Bronough St  
Tallahassee, FL 32399--0250

The Jacksonville Historical Society  
317 A Philip Randolph Blvd, Jacksonville, FL 32202

## **7.0 List of Preparers**

Greg Timoney, NEPA Compliance Section, NAVFAC SE

Douglas “Troy” Thompson, Facility Management Director, Public Works Department, NAS Jacksonville

Michelle Michael, Cultural Resources Section, NAVFAC SE

Tim Curtin, Environmental Department, NAS Jacksonville

CDR Justin Clancy, Environmental Counsel, CNRSE

George Kenny, Natural Resources Section, NAVFAC SE

## **8.0 References**

DON, 2013 . Draft Supplemental Environmental Impact Statement, or SEIS, for the home basing of the P-8A Poseidon aircraft. November 2013

DON, 2011. OPNAVINST 5090.1C CH-1 Chapter 5, Environmental Planning Under the National Environmental Policy Act . July 2011

DON. 2005. Facility Planning Criteria for Navy and Marine Corps Shore Installations ('P-80') UFC 2-000-05N 31 JAN 2005.

City of Jacksonville. 2013, Office of Economic Development  
<http://www.coj.net/departments/office-of-economic-development/business-development/market-data-and-resource-library/demographics.aspx>

# **APPENDIX A**

## **AGENCY CORRESPONDENCE**



**DEPARTMENT OF THE NAVY**  
NAVAL FACILITIES ENGINEERING COMMAND SOUTHEAST  
JACKSONVILLE, FL 32212-0030

5090  
Ser EV21/0452  
October 24, 2013

Mr. Heinz Mueller  
Chief, National Environmental Policy Act Office  
Office of Policy & Management  
Environmental Protection Agency, Region 4  
Atlanta Federal Center  
61 Forsyth Street, SW  
Atlanta, GA 30303-3104

Dear Mr. Mueller:

SUBJECT: ENVIRONMENTAL ASSESSMENT FOR THE DISPOSITION OF  
HANGARS 113, 114, 115 AT NAVAL AIR STATION  
JACKSONVILLE, DUVAL COUNTY, FLORIDA

The Department of the Navy (DON) is preparing an Environmental Assessment (EA) for the disposition of Hangars 113, 114, and 115 at Naval Air Station (NAS) Jacksonville, Florida. The purpose of this letter is to seek scoping comments that will assist the DON in project planning and analysis in accordance with the National Environmental Policy Act (NEPA) of 1969.

The EA will assess the potential effects of the proposed action and a 'no action' alternative. Enclosures (1) through (3) are a description of the project and maps showing the location of the project area. Based on the information presented, the DON respectfully requests that your agency identify any specific information, issues, or concerns that should be included in the EA and would facilitate the decision-making process. We would appreciate receiving your comments no later than December 4, 2013.

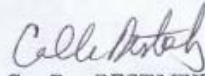
If you have any questions about this project, please feel free to contact Mr. Greg Timoney at (904) 542-6866 or email: [gregory.timoney@navy.mil](mailto:gregory.timoney@navy.mil). Written comments may be mailed to the attention of Mr. Timoney at the following address:

Commanding Officer  
Naval Facilities Engineering Command Southeast  
Attn: Mr. Greg Timoney (EV21)  
P.O. Box 30A, Bldg 903, NAS  
Jacksonville, FL 32212

5090  
Ser EV21/0452  
October 24, 2013

Your assistance in this project scoping effort is greatly appreciated.

Sincerely,



C. R. DESTAFNEY, PE  
Environmental Business Line  
Coordinator  
By direction of the  
Commanding Officer

Enclosures: 1. Project Description  
2. Project Location Map  
3. Project Site Map

Copy to:  
NAS Jacksonville (Public Works Officer)



## ENCLOSURE 1

### PROJECT DESCRIPTION

#### **Background**

Naval Air Station (NAS) Jacksonville is a multi-mission Navy installation located in the northeastern corner of Florida, along the western shore of the St. Johns River within the City of Jacksonville. World War II-era Hangars 113, 114, and 115, located at NAS Jacksonville are part of the Landplane Hangar Historic District, which has been determined eligible for the National Register of Historic Places under Criterion A for its association with World War II Naval aviation history, and Criterion C for their architecture as designed by Albert Kahn, a nationally-significant industrial architect. An Environmental Assessment (EA) is needed because these buildings are eligible for listing in the National Register of Historic Places and demolition, if selected, is considered an adverse effect under section 106 of NHPA. The EA will mainly focus on the analysis of impacts to historical resources since there is little or no other environmental effects associated with the proposed action.

#### **Proposed Action, Purpose & Need**

The proposed action is the demolition of by hangars 113, 114, 115 at NAS Jacksonville to eliminate tower visibility and vertical obstruction problems via demolition. The purpose of the proposed action is to alleviate violations of Navy and DOD regulations for aviation facilities with regard to visibility of taxiways and parking areas from the tower, and vertical obstructions adjacent to the runway. The action is needed because, due to their location, Hangars 113, 114, and 115 are in violation of Navy and DOD regulations concerning both visibility of taxiways and ramp areas from the tower and height restrictions on structures adjacent to runways.

#### **Alternatives**

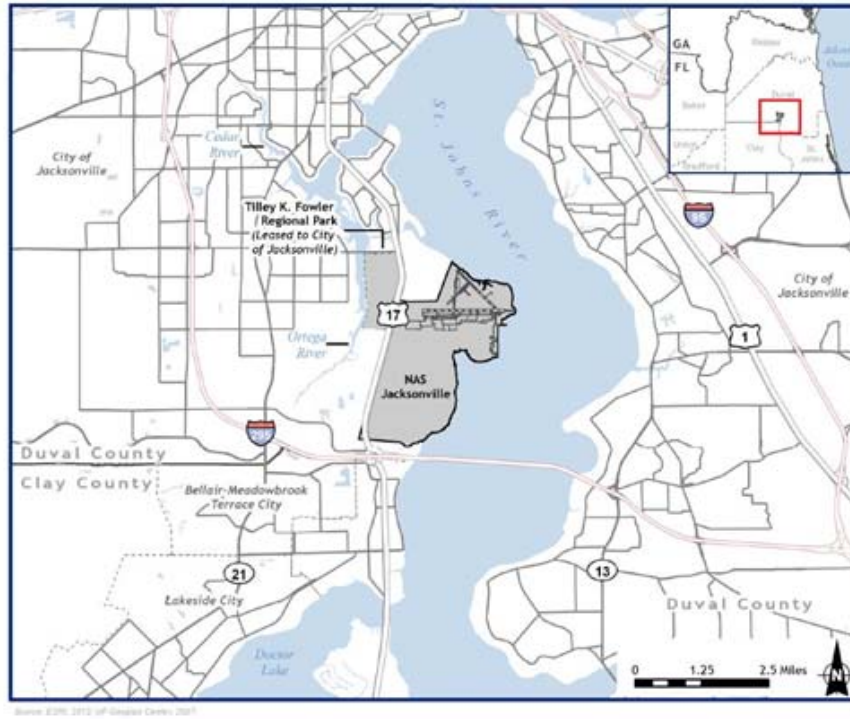
##### Alternative 1 (Demolish Hangars 113, 114, and 115)

Alternative 1, which is the demolition of Hangars 113, 114, and 115, is the preferred alternative. Demolition is the only economically feasible route which removes the vertical obstruction and improves visibility of the western ramp area and taxiways from the tower, thus meeting the purpose and need for the action. The waste material would be reused, recycled, or disposed of appropriately in an approved landfill, in accordance with all applicable rules and regulations. The space would be used for aircraft parking, less the area of the building slabs which would be cleared of rubble and seeded.

##### Alternative 2 ("no action" alternative)

The evaluation of Alternative 2, the "no action" alternative, is required by NEPA and Navy regulations, and involves the Navy taking no action regarding the status of hangars 113, 114, and 115. Allowing the building to remain as is constitutes accepting the continuance of a flight safety hazard with little or no benefit obtained in support of the airfields mission.

ENCLOSURE 2



Regional Map

ENCLOSURE 3



Location of Hangars 113, 114, 115 at NAS Jacksonville



**DEPARTMENT OF THE NAVY**  
NAVAL FACILITIES ENGINEERING COMMAND SOUTHEAST  
JACKSONVILLE, FL 32212-0030

5090  
Ser EV21/0453  
October 24, 2013

Florida State Clearinghouse  
Florida Department of Environmental Protection  
Attn: Ms. Lauren P. Milligan  
3900 Commonwealth Blvd  
Mail Station 47  
Tallahassee, FL 32399

Dear Ms. Milligan:

SUBJECT: ENVIRONMENTAL ASSESSMENT FOR THE DISPOSITION OF  
HANGARS 113, 114, 115 AT NAVAL AIR STATION  
JACKSONVILLE, DUVAL COUNTY, FLORIDA

The Department of the Navy (DON) is preparing an Environmental Assessment (EA) for the disposition of Hangars 113, 114, and 115 at Naval Air Station (NAS) Jacksonville, Florida. The purpose of this letter is to seek scoping comments that will assist the DON in project planning and analysis in accordance with the National Environmental Policy Act (NEPA) of 1969.

The EA will assess the potential effects of the proposed action and a 'no action' alternative. Enclosures (1) through (3) are a description of the project and maps showing the location of the project area. Based on the information presented, the DON respectfully requests that your agency identify any specific information, issues, or concerns that should be included in the EA and would facilitate the decision-making process. We would appreciate receiving your comments no later than December 4, 2013.

If you have any questions about this project, please feel free to contact Mr. Greg Timoney at (904) 542-6866 or email: [gregory.timoney@navy.mil](mailto:gregory.timoney@navy.mil). Written comments may be mailed to the attention of Mr. Timoney at the following address:

Commanding Officer  
Naval Facilities Engineering Command Southeast  
Attn: Mr. Greg Timoney (EV21)  
P.O. Box 30A, Bldg 903, NAS  
Jacksonville, FL 32212

5090  
Ser EV21/0453  
October 24, 2013

Your assistance in this project scoping effort is greatly appreciated.

Sincerely,



C. R. DESTAFNEY, PE  
Environmental Business Line  
Coordinator  
By direction of the  
Commanding Officer

Enclosures: 1. Project Description  
2. Project Location Map  
3. Project Site Map

Copy to:  
NAS Jacksonville (Public Works Officer)



## ENCLOSURE 1

### PROJECT DESCRIPTION

#### **Background**

Naval Air Station (NAS) Jacksonville is a multi-mission Navy installation located in the northeastern corner of Florida, along the western shore of the St. Johns River within the City of Jacksonville. World War II-era Hangars 113, 114, and 115, located at NAS Jacksonville are part of the Landplane Hangar Historic District, which has been determined eligible for the National Register of Historic Places under Criterion A for its association with World War II Naval aviation history, and Criterion C for their architecture as designed by Albert Kahn, a nationally-significant industrial architect. An Environmental Assessment (EA) is needed because these buildings are eligible for listing in the National Register of Historic Places and demolition, if selected, is considered an adverse effect under section 106 of NHPA. The EA will mainly focus on the analysis of impacts to historical resources since there is little or no other environmental effects associated with the proposed action.

#### **Proposed Action, Purpose & Need**

The proposed action is the demolition of by hangars 113, 114, 115 at NAS Jacksonville to eliminate tower visibility and vertical obstruction problems via demolition. The purpose of the proposed action is to alleviate violations of Navy and DOD regulations for aviation facilities with regard to visibility of taxiways and parking areas from the tower, and vertical obstructions adjacent to the runway. The action is needed because, due to their location, Hangars 113, 114, and 115 are in violation of Navy and DOD regulations concerning both visibility of taxiways and ramp areas from the tower and height restrictions on structures adjacent to runways.

#### **Alternatives**

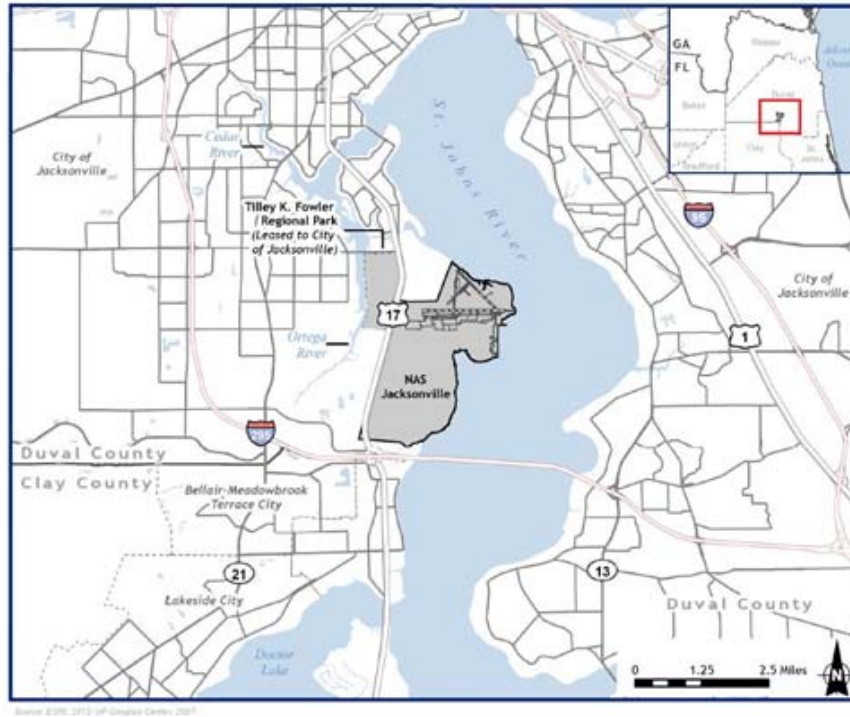
##### Alternative 1 (Demolish Hangars 113, 114, and 115)

Alternative 1, which is the demolition of Hangars 113, 114, and 115, is the preferred alternative. Demolition is the only economically feasible route which removes the vertical obstruction and improves visibility of the western ramp area and taxiways from the tower, thus meeting the purpose and need for the action. The waste material would be reused, recycled, or disposed of appropriately in an approved landfill, in accordance with all applicable rules and regulations. The space would be used for aircraft parking, less the area of the building slabs which would be cleared of rubble and seeded.

##### Alternative 2 (“no action” alternative)

The evaluation of Alternative 2, the “no action” alternative, is required by NEPA and Navy regulations, and involves the Navy taking no action regarding the status of hangars 113, 114, and 115. Allowing the building to remain as is constitutes accepting the continuance of a flight safety hazard with little or no benefit obtained in support of the airfields mission.

ENCLOSURE 2



Regional Map

ENCLOSURE 3



Location of Hangars 113, 114, 115 at NAS Jacksonville



**APPENDIX B**  
**SECTION 106 CONSULTATION CORRESPONDENCES**



**DEPARTMENT OF THE NAVY**  
NAVAL FACILITIES ENGINEERING COMMAND SOUTHEAST  
JACKSONVILLE, FL 32212-0030

5090  
Ser EV23/0429  
September 30, 2013

Ms. Kelly Fanizzo  
Historic Preservation Specialist  
Advisory Council on Historic Preservation  
1100 Pennsylvania Avenue, NW, Suite 803  
Old Post Office Building  
Washington, DC 20004

Dear Ms. Fanizzo:

SUBJECT: DEMOLITION OF HANGARS 113, 114, AND 115 AT NAVAL AIR  
STATION (NAS) JACKSONVILLE, FLORIDA

The Navy is writing to notify your office that we have initiated consultation with the Florida State Historic Preservation Officer (SHPO) regarding the proposed demolition of Hangars 113, 114, and 115 at NAS Jacksonville, FL (see Enclosure 1). This letter serves as our invitation to the ACHP to participate in the consultation. The hangars no longer support the mission at NAS Jacksonville as they are too small to accommodate the P-8A Poseidon, the new maritime reconnaissance jet aircraft that is replacing the turbo-propelled P-3 Orion platform.

Hangars 113, 114, and 115 were constructed circa 1941 as three of four landplane hangars at NAS Jacksonville. The hangars were determined eligible for listing in the National Register of Historic Places as contributing buildings in the Landplane Hangar Historic District under Criteria A and C (see Enclosure 2). Constructed ca. 1941, they are significant for their association with naval aviation during World War II and were built from standardized plans designed by Albert Kahn, a prolific industrial architect.

An Economic Analysis was recently completed in compliance with DoDI 4715.16. The report is enclosed for your review and file (Enclosure 2). In addition to the economic issues associated with maintaining the hangars, there are also mission and safety issues associated with the hangars. The hangars no longer serve the mission at NAS Jacksonville. When the hangars were constructed in 1941, the propeller-driven planes they serviced were much smaller and fit easily inside the buildings.

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Ser EV23/0429  
September 30, 2013

By contrast, the D-8A jet aircraft that are now planned for NAS Jacksonville are too large to fit into the hangars for maintenance. Lastly, NAS Jacksonville has been operating under a waiver due to sightline obstruction and glide ration ratio requirements. The demolition of the hangars will lift the waiver and allow for a safer flight environment at the airfield. As a result, the Navy has concluded that demolition is the most prudent and feasible way forward.

The proposed demolition of Hangars 113, 114, and 115 constitutes an adverse effect which the Navy must seek to mitigate. As such, we have enclosed for your review a draft Memorandum of Agreement (MOA) (Enclosure 3) that details the conditions of the property and the manner in which the Navy proposes to compensate for its loss. The draft MOA is included to facilitate your review of our recommendations and does not foreclose our obligation to fully consult with you or to accommodate your questions or comments. The Navy has sent the same information to the State Historic Preservation Office (SHPO) as well as the Jacksonville Historical Society.

Before a final version of the MOA is developed, the Navy will post a classified advertisement in a local newspaper and solicit public comments on the proposed action to demolish Hangars 113, 114, and 115. The Navy will consider all comments that are received and consult with your office and the SHPO, as warranted, with the intent to render amendments to the draft MOA. The Navy seeks your review and comment on these materials and input on the draft MOA so that we can further this consultation.

Please provide comments to Mr. Len Winter, NAVFAC Southeast Historic Preservation Officer at the following address. You may also contact Mr. Winter by email at: [len.winter@navy.mil](mailto:len.winter@navy.mil) or by telephone at (904) 542-6861.

Commanding Officer  
Naval Facilities Engineering Command Southeast  
ATTN: Mr. Len Winter (EV23)  
P.O. Box 30A, Bldg 903, NAS  
Jacksonville, FL 32212-0030

5090  
Ser EV23/0429  
September 30, 2013

Thank you for your time and assistance.

Sincerely,



C. R. DESTAFNEY, PE  
ENVIRONMENTAL BUSINESS LINE  
Coordinator  
By direction of the  
Commanding Officer

Enclosures: 1. Map Detail, Landplane Hangar Historic District  
2. Economic Analysis  
3. Draft MOA

Copy to:

Mr. Robert Bendus, Florida State Historic Preservation Officer  
Ms. Emily Lisolka, Jacksonville Historical Society  
Mr. Douglas Thompson, Facilities Manager, NAS Jacksonville  
Ms. Christine Bauer, Cultural Resources Manager, NAS Jacksonville  
Mr. Len Winter, Historic Preservation Officer, NAVFAC SE  
Mr. Royce Kemp, NEPA Compliance Section Head, NAVFAC SE



**DEPARTMENT OF THE NAVY**  
NAVAL FACILITIES ENGINEERING COMMAND SOUTHEAST  
JACKSONVILLE, FL 32212-0030

5090  
Ser EV23/0430  
September 30, 2013

Ms. Emily Lisska, Executive Director  
Jacksonville Historical Society  
Old St. Andrews  
317 A. Philip Randolph Blvd  
Jacksonville, FL 32202-2217

Dear Ms. Lisska:

SUBJECT: DEMOLITION OF HANGARS 113, 114, AND 115 AT NAVAL AIR  
STATION (NAS) JACKSONVILLE, FLORIDA

The Navy is writing in regard to the proposed demolition of Hangars 113, 114, and 115, contributing buildings in the Landplane Hangar Historic District at Naval Air Station Jacksonville. We are seeking your participation as an interested party in our consultation as provided under Section 106 of the NHPA.

Hangars 113, 114 and 115 are contributing buildings under criteria A and C in the Landplane Hangar Historic District on NAS Jacksonville, a district determined eligible for listing in the National Register of Historic Places (NRHP) (see Enclosure 1). Constructed ca. 1941, they are significant for their association with naval aviation during World War II and are were built from standardized plans designed by Albert Kahn, a prolific industrial architect.

An Economic Analysis was recently completed in compliance with Department of Defense Instruction 4715.16. The report is enclosed for your review and file (Enclosure 2). In addition to the economic issues associated with maintaining the hangars, there are also mission and safety issues associated with the hangars. The hangars no longer serve the mission at NAS Jacksonville. When the hangars were constructed in 1941, the propeller-driven planes they serviced were much smaller and fit easily inside the buildings. By contrast, the P-8A jet aircraft that are now planned for NAS are too large to fit into the hangars for maintenance. Lastly, NAS Jacksonville has been operating under a waiver due to sightline obstruction and glide ratio requirements. The demolition of the hangars will lift the waiver and allow for a safer flight environment at the airfield. As a result, the Navy has concluded that demolition is the most prudent and feasible way forward.

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Ser EV23/0430  
September 30, 2013

The Navy recognizes that demolition of a historic building is an adverse effect and will consult with the Florida SHPO to mitigate that effect. A draft Memorandum of Agreement (MOA) is enclosed for your review and comment (Enclosure 3). The draft MOA is included to facilitate your review of our recommendations and does not foreclose our obligation to fully consult with you or to accommodate your questions or comments. We would appreciate any comments you may have regarding the draft MOA within thirty days of receipt.

Please provide comments to Mr. Len Winter, NAVFAC Southeast Historic Preservation Officer at the following address. You may also contact Mr. Winter by email at: len.winter@navy.mil or by telephone at (904) 542-6861.

Commanding Officer  
Naval Facilities Engineering Command Southeast  
ATTN: Mr. Len Winter (EV23)  
P.O. Box 30A, Bldg 903, NAS  
Jacksonville, FL 32212-0030

Thank you for your time and assistance.

Sincerely,



C. R. DESTAFNEY, PE  
Environmental Business Line  
Coordinator  
By direction of the  
Commanding Officer

Enclosures: 1. Map Detail, Landplane Hangar Historic District  
2. Economic Analysis  
3. Draft MOA

Copy to:

Mr. Robert Bendus, Florida State Historic Preservation Officer  
Ms. Kelly Fanizzo, Advisory Council on Historic Preservation  
Mr. Douglas Thompson, Facilities Manager, NAS Jacksonville  
Ms. Christine Bauer, Cultural Resources Manager, NAS Jacksonville  
Mr. Len Winter, Historic Preservation Officer, NAVFAC SE  
Mr. Royce Kemp, NEPA Compliance Section Head, NAVFAC SE





**DEPARTMENT OF THE NAVY**  
NAVAL FACILITIES ENGINEERING COMMAND SOUTHEAST  
JACKSONVILLE, FL 32212-0030

5090  
Ser EV23/0431  
September 30, 2013

Mr. Robert F. Bendus  
State Historic Preservation Officer  
Cultural and Historic Programs  
500 S. Bronough Street  
Tallahassee, FL 32399-0250

Dear Mr. Bendus:

SUBJECT: DEMOLITION OF HANGARS 113, 114, AND 115 AT NAVAL AIR  
STATION (NAS) JACKSONVILLE, FLORIDA

The Navy is writing in regard to the proposed demolition of Hangars 113, 114, and 115, contributing buildings in the Landplane Hangar Historic District at Naval Air Station Jacksonville. We are seeking your review of this project in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended and 36 CFR Part 800: Protection of Historic Properties.

Hangars 113, 114 and 115 are contributing buildings under criteria A and C in the Landplane Hangar Historic District on NAS Jacksonville, a district determined eligible for listing in the National Register of Historic Places (NRHP) (see Enclosure 1). Constructed ca. 1941, they are significant for their association with naval aviation during World War II and were built from standardized plans designed by Albert Kahn, a prolific industrial architect.

An Economic Analysis was recently completed in compliance with Department of Defense Instruction 4715.16. The report is enclosed for your review and file (Enclosure 2). In addition to the economic issues associated with maintaining the hangars, there are also mission and safety issues associated with the hangars. The hangars no longer serve the mission at NAS Jacksonville. When the hangars were constructed in 1941, the propeller-driven planes they serviced were much smaller and fit easily inside the buildings. By contrast, the P-8A jet aircraft that are now planned for NAS are too large to fit into the hangars for maintenance. Lastly, NAS Jacksonville has been operating under a waiver due to sightline obstruction and glide ratio requirements. The demolition of the hangars will lift the waiver and allow for a safer flight environment at the airfield.

5090  
Ser EV23/0431  
September 30, 2013

As a result, the Navy has concluded that demolition is the most prudent and feasible way forward.

The Navy recognizes that demolition of a historic building is an adverse effect and is prepared to consult with the Florida SHPO to mitigate that effect. A draft Memorandum of Agreement (MOA) is provided for your review and comment (Enclosure 3). This legal instrument is designed to facilitate your review of Navy recommendations and is not intended to foreclose requisite consultation with your office. In addition to consultation with your office, we have extended an invitation to the Jacksonville Historical Society and the Advisory Council on Historic Preservation.

We look forward to receiving your comments on the draft MOA. Once we receive your initial comments, we will consult with your office to resolve any discrepancies with the intent to advertise the MOA for public comment. Please provide comments to Mr. Len Winter, NAVFAC Southeast Historic Preservation Officer at the following address. You may also contact Mr. Winter by email at: len.winter@navy.mil or by telephone at (904) 542-6861.

Commanding Officer  
Naval Facilities Engineering Command Southeast  
ATTN: Mr. Len Winter (EV23)  
P.O. Box 30A, Bldg 903, NAS  
Jacksonville, FL 32212-0030

Thank you for your time and assistance.

Sincerely,



C. R. DESTAFNEY, PE  
Environmental Business Line  
Coordinator  
By direction of the  
Commanding Officer

Enclosures: 1. Map Detail, Landplane Hangar Historic District  
2. Economic Analysis  
3. Draft MOA



5090  
Ser EV23/0431  
September 30, 2013

Copy to:

Ms. Kelly Fanizzo, Advisory Council on Historic Preservation  
Ms. Emily Lisska, Jacksonville Historical Society  
Mr. Douglas Thompson, Facilities Manager, NAS Jacksonville  
Ms. Christine Bauer, Cultural Resources Manager, NAS Jacksonville  
Mr. Len Winter, Historic Preservation Officer, NAVFAC SE  
Mr. Royce Kemp, NEPA Compliance Section Head, NAVFAC SE



**FLORIDA DEPARTMENT OF STATE**

**RICK SCOTT**  
Governor

**KEN DETZNER**  
Secretary of State

Commanding Officer  
Naval Facilities Engineering Command Southeast  
ATTN: Mr. Len Winter  
P.O. Box 30A (Bldg 903/EV23)  
Jacksonville, Florida 32212-0030

May 1, 2013

RE: DHR Project File Number: 2013-1714  
5090 Ser EV23/0145  
*Invitation to Consult in the Matter of a Proposal to Demolish Hangars 113, 114, and 115  
Naval Air Station Jacksonville, Duval County*

Dear Commander:

This office reviewed the referenced project for possible impact to historic properties listed, or eligible for listing, in the *National Register of Historic Places*. The review was conducted in accordance with Section 106 of the *National Historic Preservation Act of 1966*, as amended and *36 CFR Part 800: Protection of Historic Properties*.

Hangar 113 (8DU11723), 114 (8DU11724), and 115(8DU11725) , have been previously determined to appear to meet the criteria for listing in the *National Register* as a contributing resource to the Landplane Hangar Historic District. The proposed demolition would have an adverse effect on the historic properties and district. Therefore, procedures relating to 36 CFR Part 800.6 Resolution of Adverse Effects must be followed. Per 36 CFR § 800.6(a), the Agency (Navy) shall continue consultation with the SHPO and other consulting parties to develop and evaluate alternatives or modifications to the undertakings that could avoid, minimize or mitigate adverse effects on historic properties. The Agency shall submit a *case study*\* outlining these efforts for review by the SHPO. *A case study is a document that outlines a federal agency's efforts to develop and evaluate alternatives or modifications to a project that could avoid or minimize adverse effects to cultural resources. The case study provides a record of an agency's due diligence to carefully consider the impacts of its actions upon cultural resources. The document may also reveal previously unidentified but feasible alternatives that will avoid impacts altogether.*

We note that the Navy has begun conducting a case study and will forward the report to our office when it becomes available. We look forward to working with you on a successful project. If you have any questions concerning our comments, please contact Scott Edwards, Historic Preservationist, by electronic mail [scott.edwards@dos.myflorida.com](mailto:scott.edwards@dos.myflorida.com), or at 850.245.6333 or 800.847.7278.

Sincerely,

*Timothy A. Parsons, DSHPO for*

Robert F. Bendus, Director  
Division of Historical Resources  
and State Historic Preservation Officer

PC: Christine Bauer, NASJ



DIVISION OF HISTORICAL RESOURCES  
R. A. Gray Building • 500 South Bronough Street • Tallahassee, Florida 32399-0250  
Telephone: 850.245.6300 • [www.flheritage.com](http://www.flheritage.com)  
*Commemorating 500 years of Florida history* [www.fl500.com](http://www.fl500.com)





FLORIDA DEPARTMENT OF STATE

RICK SCOTT  
Governor

KEN DETZNER  
Secretary of State

Mr. C. R. Destafney, PE  
Environmental Business Line Coordinator  
Naval Facilities Engineering Command Southeast  
P.O. Box 30A, Bldg. 903 NAS  
Jacksonville, FL 32212-0030

October 25, 2013

RE: DHR Project File Number: 2013-4427/ Received by SHPO: October 2, 2013  
*Section 106 and NEPA review: Demolition of Hangars 113, 114, and 115 at Naval Air Station (NAS)*  
Jacksonville, Duval County

Dear Mr. Destafney:

Our office reviewed the referenced project for possible impact to historic properties listed, or eligible for listing, in the *National Register of Historic Places*, or otherwise of historical, architectural or archaeological value. The review was conducted in accordance with Section 106 of the *National Historic Preservation Act of 1966*, as amended and *36 CFR Part 800: Protection of Historic Properties*.

We note that Hangars 113 (#DU11723), 114 (#DU11724), and 115 (#DU11725) are considered contributing resources to the Landplane Historic District, which is considered eligible for listing in the *National Register*. This office concurs with your determination that the proposed undertaking will have an adverse effect on the historic resources. Since the State Historic Preservation Office (SHPO) has determined that the demolition will constitute an adverse effect, procedures relating to 36 CFR Part 800.6 Resolution of Adverse Effects must be followed, as stipulated below.

1) Per 36 CFR § 800.6(a), the Agency (Navy - NAS) shall continue consultation with the SHPO and other consulting parties to develop and evaluate alternatives or modifications to the undertakings that could avoid, minimize or mitigate adverse effects on historic properties. The Agency shall submit a *case study*\* outlining these efforts for review by the SHPO.

\* *A case study is a document that outlines a federal agency's efforts to develop and evaluate alternatives or modifications to a project that could avoid or minimize adverse effects to cultural resources. The case study provides a record of an agency's due diligence to carefully consider the impacts of its actions upon cultural resources. The document may also reveal previously unidentified but feasible alternatives that will avoid impacts altogether.*

Our office notes that the Economic Analysis provided with the application takes into account the effort and costs associated with each alternative option, including No Action, Full Rehabilitation, Minimal Rehabilitation, Demolition, and Mothballing. Consideration is given to the historic context of these sites, and our office understands that re-use for these resources is limited as they no longer meet current operational needs.



DIVISION OF HISTORICAL RESOURCES  
R. A. Gray Building • 500 South Bronough Street • Tallahassee, Florida 32399-0250  
Telephone: 850.245.6300 • [www.flheritage.com](http://www.flheritage.com)  
Commemorating 500 years of Florida history • [www.vivaflorida.org](http://www.vivaflorida.org)



Mr. Destafney  
DHR Project File No.: 2013-4427  
October 25, 2013  
Page 2

(2) In accordance with 36 CFR § 800.6(a)(4), the Agency shall make information regarding this finding available to the public, providing the public with an opportunity to express their views on resolving adverse effects of the undertaking. Pursuant to 36 CFR § 800.11(e), copies or summaries of any views provided by consulting parties and the public shall be made available to the SHPO as part of the case study outlined in (1).

(3) The Agency shall immediately notify the Advisory Council on Historic Preservation (ACHP), Old Post Office Building, 1100 Pennsylvania Avenue, NW, Suite 809, Washington, D.C. 20004, of the adverse effect finding per 36 CFR § 800.5 (a)(1). The notification to the ACHP should be similar to the project information submitted to this office and should include the following documentation as outlined in 36 CFR § 800.11(e).

(4) The Agency shall invite the ACHP to participate in consultation if the undertaking will affect a National Historic Landmark, if a Programmatic Agreement will be developed as a result of the finding of adverse effect, or if the Agency wants the ACHP to participate in consultation. The ACHP will advise of its decision to participate in consultation within fifteen (15) days of receipt of this notification or other request. If the ACHP chooses not to participate in consultation, the Agency shall resolve the adverse effect without ACHP participation and pursuant to 36 CFR § 800.6(b)(1).

Per correspondence with Kelly Fanizzo, an ACHP representative, our office understands that the ACHP will not be involved in these proceedings due to the mutual agreement between Agency and this office of an adverse effect and necessary mitigation measures.

(5) If the Agency, the SHPO and, if applicable, the ACHP agree on how the adverse effects will be resolved, they shall execute a Memorandum of Agreement (MOA) pursuant to 36 CFR § 800.6(c).

(6) If the Agency and the SHPO fail to agree on the terms of the MOA, the Agency shall request the ACHP to join the consultation. If the ACHP decides to join the consultation, the Agency shall proceed in accordance with 36 CFR § 800.6(b)(2). If the ACHP decides not to join the consultation, the ACHP will notify the Agency and proceed to comment in accordance with 36 CFR § 800.7.

We look forward to developing a Memorandum of Agreement (MOA) with your Agency to outline possible options for mitigating the adverse effect to these historic resources.

If you have any questions concerning our comments, please contact Desiree Estabrook, Historic Sites Specialist, by email at [Desiree.Estabrook@doh.myflorida.com](mailto:Desiree.Estabrook@doh.myflorida.com), or at 850-245-6333.

Sincerely



Robert F. Bendus, Director  
Division of Historical Resources  
and State Historic Preservation Officer

PC: Mr. Len Winter (EV23), NAVFAC Southeast Historic Preservation Officer

**APPENDIX C**  
**MEMORANDUM OF AGREEMENT**

## **APPENDIX D**

### **ECONOMIC ANALYSIS**