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Vice Chairman

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August 11, 2022

The Honorable Charles F. Sams III  
Director, National Park Service  
1849 C Street, NW  
Washington, DC 20240

Ref: *Request for Section 213 Report Regarding effects to the Pensacola Naval Air Station National Historic Landmark from the proposed demolition of Quarters 4, 5, 6, and Ancillary Buildings 4C and 6C*  
*Naval Air Station Pensacola, Escambia County, Florida*  
*ACHP Project Number: 018453*

Dear Mr. Sams:

Pursuant to Section 213 of the National Historic Preservation Act (NHPA), 54 USC §304110, the Advisory Council on Historic Preservation (ACHP) requests that the National Park Service (NPS) provide an assessment of how the Navy Region Southeast (Navy) proposed demolition of five contributing resources to the Pensacola Naval Air Station National Historic Landmark (Pensacola NAS NHL) (Quarters 4, 5, 6, and Ancillary Buildings 4C and 6C) could affect the integrity of the NHL and the ability of the Navy to interpret the historic property. Since June 2022, the ACHP has been consulting with the Navy, the Florida State Historic Preservation Office (SHPO), the NPS Interior Region 2, and the National Trust for Historic Preservation (NTHP) regarding the proposed demolition.

In March 2005 the *Memorandum of Agreement Among the United States Navy, the Florida State Historic Preservation Officer, and the Advisory Council on Historic Preservation Regarding Repair, Rehabilitation, and Demolition of Historic Resources at the Naval Facilities in the Pensacola, Florida, Region Resulting from the Effects of Hurricane Ivan* (2005 MOA) was executed. In July 2005, the ACHP received notice of a dispute regarding the Navy's proposal to demolish 13 of 16 of the most significant contributing resources to the Pensacola NAS NHL, including Quarters 4, 5, and 6. In accordance with Stipulation III(E)(2)(c), the ACHP Chairman elected to consider the matter under 36 CFR § 800.7(c) and issued comments to Secretary of the Navy Gordon R. England in August 2005. Following receipt of these comments, Secretary England concluded the dispute by committing the Navy to several actions including the repair and reuse of Quarters 5 and retaining and mothballing Quarters 4 and 6 while determining the best adaptive reuse of each building. The Navy maintained that with the retention of these quarters (along with Quarters 7 and 8 but with the loss of Quarters 2 and 3) an "Admiral's Row" streetscape would remain.

It is our understanding that Quarters 4, 5, 6, and ancillary Buildings 4C and 6C were retained and mothballed and have been vacant and unused since 2006. They were found excess to the mission of NAS Pensacola in 2019. As a result of storm damage incurred most recently by Hurricane Sally in September

ADVISORY COUNCIL ON HISTORIC PRESERVATION

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2020, the Navy conducted a condition assessment of the quarters in December 2021. According to the Navy's report, the mothballed quarters evidenced significant deterioration associated with nonuse, and there is a "severe risk of structural failure of components of the facility that could result in some loss of life or critical assets, requiring significant further structural analysis." The Navy proposes demolition of these five buildings as the most prudent alternative.

In 2005, the NPS Interior Region 2 expressed concerns that the demolition of contributing resources would jeopardize the designation and, depending on extent, possibly lead to the loss of NHL status. The Regional Chief of History at that time said,

"It is impossible to predict with certainty what constitutes a 'bare minimum' of contributing structures that must remain for the NHL district to be viable. It is also not a matter of mere numbers, because each contributing building possesses a unique value.... Demolition beyond that in the Florida SHPO proposal (coupled with demolition that has already occurred since NHL listing) would likely lead to a withdrawal of designation."

To assist the Navy in its assessment of effects and inform the ACHP's participation in consultation regarding this proposed demolition, we request the NPS' opinion on the extent to which the demolition of these contributing resources, as well as future demolition of any contributing resource, would impact those character-defining features that qualify the historic property for NHL designation, and steps that could be taken to avoid, minimize, or mitigate adverse effects. This information will assist the Navy and consulting parties in better understanding whether and how the integrity of the Pensacola NAS NHL may be further compromised by the additional loss of contributing resources before the Navy makes its final decision on the proposed undertaking.

The ACHP requests that the NPS provide the Section 213 report within 60 days of your receipt of this letter, in accordance with the guidance developed by the ACHP and the NPS for requesting and coordinating Section 213 reports. In anticipation of this request, ACHP staff members have spoken with Ms. Alesha Cerny, Acting Branch Manager, Archeological and Historic Preservation Partnerships for Interior Region 2, and understand that the Regional Office already has access to adequate information on the undertaking to complete the report.

Ms. Katharine R. Kerr is representing the ACHP in this consultation and would be pleased to assist you or the Regional Office. She can be reached at (202) 517-0216 or by email at [kkerr@achp.gov](mailto:kkerr@achp.gov). We are grateful for your assistance and look forward to receiving the report.

Sincerely,



Reid J. Nelson  
Executive Director, Acting