UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

May 18, 2009

Tiffany Patrick
15 CES/CEVP
NEPA Program Technical Support
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Hickam AFB, HI 96853

Subject: EPA Comments on the Alternatives for the Disposition of Fort Kamehameha Historic District Buildings and Structures Draft Environmental Impact Statement (DEIS), 15th Airlift Wing, Hickam Air Force Base (AFB), Hawaii (CEQ #20090094)

Dear Ms. Patrick:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

EPA has no objections to the proposed project and has rated the DEIS as Lack of Objections (LO) (see enclosed "Summary of Rating Definitions"). EPA encouraged the Air Force to preserve Fort Kamehameha and to pursue its listing on the National Register of Historic Places (NRHP) in our comments on the Hickam AFB Housing Privatization Phase II DEIS (letter dated June 7, 2006). The DEIS does not identify a preferred alternative, but Alternative A: adaptive re-use in place, would most clearly sustain the eligibility of the Fort Kamehameha Historic District and the Artillery District of Honolulu on the NRHP (p. 4-9); therefore, EPA encourages selection of this alternative if long-term lease arrangements can be made.

The DEIS states that it is unlikely that global climate change could affect any of the alternatives (p. 5-8). We note that this may not be true for longer-term management of this historic resource. There is strong evidence that global sea level is currently rising at an increased rate[1] and this could be especially problematic for coastal areas on islands. Local researchers have concluded that "the impacts of sea-level rise within our lifetime in Hawaii are going to be significant and may lead to irreversible effects"[2]. Because Fort Kamehameha Historic District buildings are located adjacent to the coast, a relocation and retreat strategy may be appropriate

[1] IPCC, 2007: Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change [Solomon, S., D. Qin, M. Manning (eds.)].
[2] Fletcher, C.H. et. al. (in prep.- 2009) *On the Shores of Paradise*. UH Press, Chapter 8, page 15. Available: http://www.soest.hawaii.edu/coasts/publications/shores/8Climate_change_and_Sea-level_rise_FLETCHER-final.pdf

for some of the structures in the longer term. EPA recommends the Air Force monitor the condition of the historic buildings and structures for evidence of effects associated with climate change (e.g., effects from sea level rise, increased intensity storms, increased coastal erosion and flooding, etc.) to inform decision-making for long-term management of these historic resources.

EPA appreciates the opportunity to review this DEIS. When the Final EIS is released for public review, please send one copy to the address above (mail code: CED-2). If you have any questions, please contact me at (415) 972-3521, or contact Karen Vitulano, the lead reviewer for this project, at 415-947-4178 or vitulano.karen@epa.gov.

Sincerely,

Connell Dunning

FOR Kathleen M. Goforth, Manager
Environmental Review Office (CED-2)

Enclosure: Summary of EPA Rating Definitions