



**DEPARTMENT OF THE ARMY**  
**U.S. ARMY INSTALLATION MANAGEMENT COMMAND-PACIFIC**  
**HEADQUARTERS, UNITED STATES ARMY GARRISON, HAWAII**  
**745 WRIGHT AVENUE, BUILDING 107, WHEELER ARMY AIRFIELD**  
**SCHOFIELD BARRACKS, HAWAII 96857-5000**

**SUBJECT: National Historic Preservation Act (NHPA) Section 106 Compliance for Demolition of Rice Manor at Fort Shafter, Kahauiki Ahupua'a, Kona Moku, O'ahu [TMK: (1) 1-1-008:005]; Project # CRS-20-139**

Dear Interested Public:

The U.S. Army proposes to demolish a neighborhood of 15 historic houses and associated landscape features at Fort Shafter Military Reservation. The houses and the neighborhood, known as Rice Manor, were constructed between 1941 and 1943. The *Program Comment for Department of the Army Program Inter-War Era Historic Housing, Associated Buildings and Structures and Landscape Features* (Program Comment) governs NHPA Section 106 compliance for all management actions related to these properties, executed by the Advisory Council on Historic Preservation on September 4, 2020. This letter transmits the Building Disposition Report (Enclosure 1) in accordance with the demolition procedures outlined in Section 3.2.5.1 of the Program Comment.

In accordance with 36 CFR § 800.14(e), the Program Comment provides an alternative procedure for compliance with NHPA Section 106 instead of the regular process under 36 CFR §§ 800.4 through 800.6. Implementing the Program Comment enables the Army to meet its NHPA requirements while facilitating the management of its Inter-War Era houses. The Program Comment covers all management actions on historic housing and landscapes constructed in Hawaii between 1919 and 1943. Management actions include maintenance, repair, rehabilitation, renovation, abatement, mothballing, demolition, replacement construction, new construction, lease, and conveyance. The full text of the Program Comment is available at <https://denix.osd.mil/army-pchh/home/> and is also included with this letter.

The Program Comment provides a specific set of decision-making criteria and notification procedures that must be followed when the Army proposes demolition of Inter-War Era historic houses. Under Section 3.2.5 of the Program Comment, "Inter War Era housing will be considered for demolition when it is highly deteriorated, and/or vacant for 12 months or longer due to underutilization, and/or if potentially hazardous materials or unsafe conditions are present." The Rice Manor houses have been vacant since 2010. They contain lead-based paint and asbestos hazards, and no longer comply with the Army or Department of Defense standards for Family Housing.

The Rice Manor houses were considered and briefly reutilized for administrative space, however, the layout and size of the houses made them unsuitable for long-term administrative space. Renovating the Rice Manor houses to meet Army housing standards or for reutilization and the necessary remediation and abatement is cost-prohibitive and is not a feasible or prudent solution. The current proposal calls for the demolition of the houses and leasing or transfer of the land at Rice Manor to the State of Hawaii Department of Education for the construction of a new elementary school.

Section 3.2.5.1 of the Program Comment requires the Army to prepare a Building Disposition Report and provide it to the State Historic Preservation Officer, the Advisory Council on Historic Preservation, Native Hawaiian Organizations, and the public for a 30-day comment period. Comments from any organization or individual reviewing the Report should identify if they believe there is a major deficiency in following the Program Comment Demolition Procedure specified in Section 3.2.5.1a-f. A major deficiency means that “a required numbered or lettered step in an identified procedure in this Program Comment has been entirely omitted, not reasonably addressed, or is substantially incomplete.”

The Building Disposition Report, the full text of the Program Comment, and a list of organizations and individuals to whom the Report has been distributed, is available through the Section 106 Consultation & Public Notices tab of U.S. Army Garrison, Hawaii Cultural Resources web site: <https://home.army.mil/hawaii/garrison/dpw/cultural-resources>.

I respectfully request that you review the Report and provide any comments you may have no later than March 21, 2024. Comments or questions should be sent to the U.S. Army Garrison, Hawaii Cultural Resources Office by email at [usarmy.hawaii.crimp@mail.mil](mailto:usarmy.hawaii.crimp@mail.mil).

Sincerely,

A handwritten signature in black ink, appearing to read 'S. McGunegle', written over the printed name.

Steven B. McGunegle  
Colonel, U.S. Army  
Commanding

Enclosures