

Larry E Via, National Commander
American Veterans
4647 Forbes Blvd.
Lanham, MD 20706

Dear Mr. Via,

We greatly need the moral leadership of the American Veterans to help correct what is becoming a great injustice and dishonor to all Pearl Harbor and WW-II veterans.

The AMVET members have been greatly appreciated annual participants in the Ewa Field, December 7 commemoration honoring Pearl Harbor veterans and their families.

In 2012 we were able to obtain a \$54,000 Federal NPS American Battlefield Protection Program grant that contracted GAI Consultants to produce a complete National Register nomination of Ewa Field as an American Battlefield, which is a special and well deserved honor.

After an extensive review, Donald R. Schregardus, Assistant Secretary of the Navy sent in the prepared GAI Consultants nomination with a transmittal cover to the Keeper of the Register, NPS, who after further review entered it as the official Navy Determination of Eligibility (DOE) in February 2015.

The next step, as agreed to in a signed 2012 Programmatic Agreement, was that the Navy would support the official nomination of Ewa Field to the National Register. However at this point the local Navy real estate office, NavFac Pacific, redirected the nomination to the local State of Hawaii SHPO agency which has done nothing with it for over seven months and will not likely review it until at least November according to their office.

In correspondence with the NPS Keeper of the Register they have pointed out that the Navy has been using the wrong applicable sections of 36 CFR 60, interpreting it as a "third party" nomination when in fact only the Navy as land owner can actually submit it, not a third party. And since the local SHPO has had the nomination for over 45 days and done nothing, as per 36 CFR 60, the Navy Federal Preservation Officer can now send in the nomination for official acceptance by the NPS Keeper of the Register.

We truly believe that the NavFac Pacific real estate office using this bureaucratic maneuver should be ashamed of their intentional delay of the nomination of the Ewa Plain Battlefield. Every year combat veterans like John Hughes, USMC have come out to attend the annual Ewa Field December 7 commemoration. In frail health, he has just barely made the last two trips. Just recently we learned that Ewa combat veteran Albert Grasselli, USMC of Washington, DC has passed away. It had been his hope to live long enough to see Ewa Battlefield finally nominated to the National Register.

In the seven years of working for the nomination of Ewa Field well over half of the veterans we have been in contact with have passed away. More are just too frail in health to attend. They all ask "*Why has this taken so long?*" "*What is preventing the Navy from acting on this?*"

It could have been only a matter of months after receiving the Ewa Plain Battlefield nomination in February that it could have been sent back by the Navy to the National Register Keeper for approval. We are now asking for national support to correct this dishonor and injustice.

Their unnecessary bureaucratic delay really is about a real estate agenda to transfer the area to a land developer without any covenants and encumbrances of being a recognized American battlefield. Their delay will push any possible Ewa nomination into 2016 and also well past the 2015 December 7 Pearl Harbor commemoration. The 2015 Pearl Harbor commemoration could be the last for the dwindling Pearl Harbor veterans in their 90's like Major John Hughes.

This nomination is in a signed Navy PA and the Federal 36 CFR 60 as interpreted by the NPS Keeper of the register clearly shows the correct legal CFR process. How can the Navy act in such a dishonorable and unjust manner to Pearl Harbor, WW-II and frankly all veterans and their families that believed the Navy would keep their signed agreement after all these years.



John Bond, Director
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Approximately every three minutes a memory of World War II – its sights and sounds, its terrors and triumphs – disappears. Yielding to the unalterable process of aging, the men and women who fought and won the great conflict are now mostly in their 90s. They are dying quickly – at the rate of approximately 492 a day, according to US Veterans Administration figures.

"This place is sacred ground to the United States Marines that died there, to the Japanese aviators that perished and the civilian residents of Ewa plantation."

"Remembering our solemn commitment to their memory is the promise that is fulfilled at battlegrounds that are preserved and enshrined by our nation."

Daniel A. Martinez, Chief Historian
WWII Valor in the Pacific National Monument

Nearly everyone today knows the story of "Pearl Harbor" and what happened. But that story largely neglects what happened in West Oahu on the Ewa Plain. Not just at Ewa Field and Ewa Plantation Village, where 40 planes were destroyed- four Marines and two civilians killed, and 65 reported wounded at local hospitals. Nearby Fort Barrette was also attacked by Japanese planes, killing one soldier and wounding others.

In addition there was fierce Ewa Plain air combat that saw five Japanese planes shot down and the still largely unrecognized story of 8 Navy SBD's from the USS Enterprise that were also shot down, killing 11 officers and crewmen, as well as the two private planes shot down by Japanese Zero's carrying three West Oahu Army soldiers.

The Ewa West Oahu Battlefield (approximate) total is:
11 Navy pilots and crewmen killed (SBD's and Wildcats)
4 Marines killed (Ground) and many combat wounded
4 Army soldiers killed (3 Air, 1 Ground by strafing)
2 Civilians killed (Ground) and many dozens wounded...
22 U.S combat deaths.
Including the Japanese air crews- around 10
Overall total: 32 killed in Ewa-West Oahu on December 7, 1941.

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If determined eligible, the Navy will support nomination of the Ewa Field Battlefield to the National Register of Historic Places. Support will include providing technical assistance, review of draft nominations and supporting documents, research/documentation assistance, and access to all archival materials. The Navy Region Hawaii Historic Preservation Officer will forward the nomination to the Navy's Federal Preservation Officer for review and action, pursuant to applicable sections of 36 CFR 60.

§ 60.9 Nominations by Federal agencies.

(d) After receiving the comments of the State Historic Preservation Officer, and chief elected local official, or if there has been no response within 45 days, the Federal Preservation Officer may approve the nomination and forward it to the Keeper of the National Register of Historic Places, National Park Service, United States Department of the Interior, Washington, D.C. 20240.

Ewa Plain Battlefield nomination DOE already approved by the Navy and NPS in 2015

The Ewa Plain Battlefield nomination was an extensively researched and vetted final product of a \$54,000 Federal NPS American Battlefield Protection Program grant awarded in 2012 to 501-c-3 Ewa Plain Programs which in turn contracted GAI Consultants, a major national cultural and environmental resource survey contractor with KOKOA battlefield analysis and documentation

experience. The contract involved on site surface and sub-surface Ground Penetrating Radar survey, extensive historic records archive research, and delivering a complete NR Nomination.

The Navy as land owner reviewed the NPS ABPP funded GAI Consultants nomination product and signed a Determination of Eligibility (DOE) cover letter over the NPS-GAI nomination in November 2014 and sent it to the NPS Keeper of the Register. The Navy DOE submission was carefully reviewed by the NPS Keeper office in Washington, D.C., signed and accepted in February 2015.

The Navy agreed in a 2012 Programmatic Agreement to support the nomination of the Ewa Plain Battlefield to the National Historic Register. The Navy as land owner under Federal 36 CFR's can now send in a cover letter to the NPS Keeper accepting the NPS-GAI NR nomination, as per the Programmatic Agreement. However, for reasons determined apparently by the Naval Facilities Engineering Command, Pacific (NavFac Pac) real estate office, the Navy 36 CFR position implies the NPS-GAI NR nomination is "third party" and must go to Hawaii SHPD and the Hawaii Review Board for approval before then going to the NPS Keeper of the Register.

This is entirely a delay tactic to push the nomination into 2016 and past the land transfer

If the Navy Kalaeloa lands are transferred before the Ewa Plain Battlefield National Register nomination is processed by Hawaii SHPD and the Hawaii Review Board, Hunt Corp can and likely will as the new land owner, reject the Ewa Battlefield nomination.

Meanwhile hundreds more WW-II veterans pass away and the Ewa Battlefield veterans may likely never live long enough to see the nomination. This will forever be a major stain of dishonor on those pursuing this delay tactic for the purpose of real estate profits over honor and justice.

We don't believe this is the intent of the current commander of NavFac Pacific but instead a civilian real estate division that has their own agenda working to benefit their land developer client. Money appears to be their primary motive in derailing this nomination.

