



## Rehabilitation of Chief Petty Officer Bungalows on Ford Island

### Environmental Assessment



March 2012

**WWII Valor in the Pacific National Monument  
Pearl Harbor, Oahu, Hawaii**

*United States Department of the Interior • National Park Service*

# EXECUTIVE SUMMARY

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## Description of project

The purpose of this Environmental Assessment is to identify, evaluate and document the potential effects (adverse and beneficial) of the proposed rehabilitation scenarios for the CPO bungalows.

This Environmental Assessment has been prepared to satisfy the requirements of the National Environmental Policy Act (NEPA) of 1969 (42 U.S.C. 4341 et seq.) as amended in 1975 by P.L. 94-52 and P.L. 94-83. Additional guidance includes NPS Director's Order 12 (NPS, 2001a) which implements Section 102(2) of NEPA and the regulations established by the Council on Environmental Quality (CEQ) (40 CFR 1500-1508). The project must comply with requirements of NEPA as well as other legislation that governs land use, resource protection and other policy issues within the park. This Environmental Assessment also contains information on compliance with Section 106 of the National Historic Preservation Act and Section 7 of the Endangered Species Act.

There are three alternatives proposed in this EA, including a no-action alternative (Alternative A). The action alternatives are:

Alternative B. Rehabilitation with Visitor Focus – this alternative would rehabilitate or restore the Chief Petty Officer (CPO) bungalows following the Secretary of the Interior's Standards for Historic Preservation so that there is a wide range of opportunities for interpretation and education programs.

Alternative C. Rehabilitation with combined visitor and administrative focus – this alternative would rehabilitate or restore the CPO bungalows following the Secretary of the Interior's Standards for Historic Preservation so that there is a combination of both providing interpretation and education opportunities for visitors and providing administrative use.

The action alternatives (Alternatives B and C) are based on the purpose and need for the project. The preferred alternative is Alternative C.

If reviewers do not identify significant environmental impacts, the Environmental Assessment will be used to prepare a Finding of No Significant Impact (FONSI), which will be sent to the National Park Service Pacific West Regional Director for approval. Implementation of the selected action will then follow soon after.

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# Purpose & Need

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## Introduction

Pursuant to NPS Management Policies (2006), the National Park Service will protect, preserve, and foster appreciation of the cultural resources in its custody and demonstrate its respect for the peoples traditionally associated with those resources through appropriate programs of research, planning, and stewardship.

The NPS Management Policies provide specific guidance on historic and prehistoric structures in section 5.3.5.4 –

The treatment of historic and prehistoric structures will be based on sound preservation practice to enable the long-term preservation of a structure's historic features, materials, and qualities. There are three types of treatment for extant structures: preservation, rehabilitation, and restoration.

This Environmental Assessment (EA) describes the impacts with the proposed rehabilitation of the CPO bungalows. With the No Action alternative (Alternative A), no restoration or rehabilitation of the bungalows would occur. Minimal stabilization would continue if possible, but likely would result in continued deterioration of the historic fabric. The action alternatives would provide for varying levels of historic rehabilitation of the CPO bungalows and surrounding grounds.

This EA analyzes impacts of the project alternatives on the natural, human and cultural environments. It outlines project alternatives, describes existing conditions in the project area and analyzes the effects of each project alternative on the environment.

## Project Background

### CPO Bungalows

The Ford Island Chief Petty Officer (CPO) bungalows neighborhood is one of three historic housing areas on Ford Island. The six CPO bungalows make up the remaining Navy pre-WWII quarters built for non-commissioned officers. The bungalows are contributors to the United States Naval Base, Pearl Harbor National Historic Landmark designation.

The bungalows were constructed by the Navy between 1923 and 1939. The homes are unique examples of historic Navy housing in Hawaii. This neighborhood is directly associated with the



December 7 attack and its aftermath due to its location within Pearl Harbor and proximity to Battleship Row. On December 7, 1941, the USS *Maryland*, USS *Oklahoma*, the USS *Arizona* and the USS *Nevada* were moored on Battleship Row adjacent and upwind of this neighborhood. Many of the sailors who reached the shore from the oily, inflamed waters ended up in the neighborhood of the homes. During the salvage operations of the USS *Oklahoma*, different machinery was placed around the neighborhood. Winch systems ran cables through the neighborhood to right the battleship in the following years.

Many of the remaining homes were built at different times or relocated over the years. Four homes from 1923 (Facilities 28, 30, 31, and 32) and two 1939 homes (Facilities 68, and 90). Facility 90 was moved to its current location off of Cowpen Street. Facility 68, was constructed across Cowpen Street. Facility 30, now located on Langley Avenue, was built in 1923 on Belleau Woods Loop. Table 1 highlights the year each bungalow was built and original and current locations.

**Table 1. Original and Current Locations of the CPO Bungalows**

BUNGALOW #	YEAR BUILT	ORIGINAL LOCATION	CURRENT LOCATION	NOTES
28	1923	Belleau Wood Loop	Belleau Wood Loop	
29	1923	Belleau Wood Loop	Belleau Wood Loop	
30	1923	Belleau Wood Loop	Langley Avenue (Nob Hill Neighborhood)	Not owned by NPS – part of Navy housing on Ford Island
31	1923	Belleau Wood Loop	Belleau Wood Loop	
32	1923	Belleau Wood Loop	Belleau Wood Loop	
68	1939	Cowpens Street	Cowpens Street	
90	1939	Cowpens Street	Belleau Wood Loop	

The CPO bungalows had continuous residential use until the 1990s when they were vacated and decommissioned. The six remaining CPO bungalows were added to the World War II Valor in the Pacific National Monument in 2008.



Figure 1. Bungalow #90. Photo taken in 2010

## Admiral Clarey Bridge

The completion of the Admiral Clarey Bridge, the connection between Oahu and Ford Island, took place in 1998. The causeway provides quick access for residents, visitors, and workers to the island. Prior to the opening of the bridge, access to Ford Island was limited to ferry boat transport. The fixed/floating structure is 4,700 feet in length and includes a floating pontoon section that can retract to allow vessels to pass through.

## Battleship *Missouri* Memorial

Moored in the location of Battleship Row, the Battleship *Missouri* memorial is one of the sites located on Ford Island that is open to visitors. It is located directly along the shore of the CPO bungalows. The Battleship *Missouri* memorial is located just behind the sunken hull of the USS *Arizona* Memorial (a National Historic Landmark). The two memorials mark both the beginning and end of WWII; both are listed on the National Register of Historic Places.

## WWII Valor in the Pacific National Monument

### USS *Arizona* Memorial Visitor Center and National Park Service Presence

The joint administration of the USS *Arizona* Memorial by the Navy and the National Park Service was established in 1980. The USS *Arizona* Memorial Visitor Center was opened in 1980 and is operated by the National park Service. Having outgrown the 1980 visitor center, the National Park Service replaced the original center with a newly constructed Pearl Harbor Visitor Center. The new Pearl Harbor Visitor Center was dedicated on December 7, 2010.

### Establishment of the WWII Valor in the Pacific National Monument

The WWII Valor in the Pacific National Monument was created on December 5, 2008, through an executive order issued by George W. Bush under the authority of the Antiquities Act of 1906. The national monument honors several aspects of American engagement in World War II. It encompasses nine sites in three states. Sites include:

Hawaii (administered by the National Park Service)

- USS *Arizona* Memorial
- USS *Utah* Memorial
- USS *Oklahoma* Memorial
- Six Chief Petty Officer bungalows on Ford Island
- North and south mooring quays F6, F7, and F8, which formed part of Battleship Row in Pearl Harbor
- Pearl Harbor Visitor Center

Alaska (administered by the US Fish and Wildlife Service)

- Battlefield remnants on Attu Island
- Japanese occupation site on Kiska Island
- Crash site of a B-24D Liberator bomber on Atka Island

California (administered by the National Park Service)

- Tule Lake Segregation Center and POW Camp

## Memorials within the National Monument

### The USS *Arizona* Memorial

Suggestions for the USS *Arizona* Memorial began in 1943, but it wasn't until 1949, when the Territory of Hawaii established the Pacific War Memorial Commission, that the first real steps were taken to bring it about.

Initial recognition came in 1950 when Admiral Arthur Radford, Commander in Chief, Pacific (CINCPAC), ordered that a flagpole be erected over the sunken battleship. On the ninth anniversary of the attack, a commemorative plaque was placed at the base of the flagpole.

President Dwight D. Eisenhower, who helped achieve Allied victory in Europe during World War II, approved the creation of the Memorial in 1958. Its construction was completed in 1961 with public funds appropriated by Congress and private donations. The Memorial was dedicated in 1962. The site was listed on the National Register of Historic Places on October 15, 1966. The 184 foot long memorial spans the mid-portion of the sunken battleship *Arizona*. The actual wreck of the USS *Arizona* was declared a National Historical landmark in 1989.

### **The USS *Utah* Memorial**

The USS *Utah* lays where she sank on the north side of Ford Island. This decision was made in 1944 after several attempts at raising the ship had failed. The quiet decision was made to leave the bodies of 58 crewmen onboard, considering them buried at sea. The land-based USS *Utah* Memorial was dedicated on May 27, 1972. Visitors with military identification in their possession may visit the memorial.

### **The USS *Oklahoma* Memorial**

The USS *Oklahoma* was moored outboard the battleship USS *Maryland* and rapidly received seven to nine torpedo hits on the port (left) side. Capsizing roughly in 20 minutes after the attack began, over 400 men were trapped inside, of which only 32 were rescued. Resting in the main channel of the harbor, a major salvage operation began in March of 1943. This massive undertaking involved the use of winches installed on Ford Island, which slowly rolled the ship back into place in an upright position. The ship was then pumped out and the remains of over 400 sailors and Marines were removed. The USS *Oklahoma* Memorial, located on Ford Island and commemorating 429 Marines and Sailors who lost their lives, was dedicated on December 7, 2007.

## **Purpose and Need**

The six CPO bungalows are currently in poor condition and are at risk for complete destruction unless there is immediate attention to their stabilization and preservation.

By Presidential Proclamation, President George Bush authorized the World War II Valor in the Pacific National Monument on December 5, 2008. The national monument focuses on the events leading up to the December 7, 1941, attack to the signing of the Peace Treaty in 1952 — with the emphasis on the historical events and impact of the Pacific War. With the establishment of the National Monument, the National Park Service acquired six Chief Petty Officer (CPO) Bungalows located on Ford Island (buildings 28, 29, 31, 32, 68, and 90).

The National Park Service anticipates preparing a General Management Plan, a plan to guide long-term management of the monument, for the World War II Valor in the Pacific National Monument in the future. However, the threatened condition of the bungalows warrants immediate attention. Therefore, this Environmental Assessment is being prepared prior to the General Management Plan.

The original bungalows were constructed in the 1920's as part of an effort by Ford Island Naval Air Station to construct residences and quarters on the northwest shore and northeast tip of Ford Island. With the movement of the Pacific Fleet to Pearl Harbor in May 1940, Ford Island's northeast tip became moorage for most of the fleet's largest ships along Battleship Row. On December 7, 1941 when Japanese aircraft attacked Pearl Harbor, Navy battleships, including the USS *Arizona*, were anchored just offshore (less than 100 yards) from the bungalows. Some bungalows sustained minor damage during the attack from smoke and fire.

Very little World War II era housing remains on Ford Island. The bungalows have been determined to be important because of their association with the beginnings of naval aviation in Hawaii and with the attack on Pearl Harbor. In 1964, the bungalows were included as contributors to the newly designated Pearl Harbor National Historic Landmark.

Architecturally the bungalows are important as a group of vernacular houses that reflect Hawaii's architectural solutions for low-cost housing. Hawaiian vernacular architecture, construction using locally available resources and traditions, typically featured wood-frame construction with vertical plank siding, bellcast or hipped roofs, deep bracketed eaves, lanai, low profiles (single story) and were compatible with the landscape.

When the bungalows were acquired and became part of the WWII Valor in the Pacific National Monument, the National Park Service, performed emergency stabilization measures to ensure that the buildings would not further deteriorate.

This project will develop actions that will promote long-term preservation of the CPO bungalows. In addition to preserving the historic CPO bungalows, there is a need for education and interpretation at the site to further tell the story of the Pacific War, Pearl Harbor and military life. With the establishment of the WWII Valor in the Pacific National Monument, the National Park Service has additional needs for storage, office space and other administrative uses. This project will use rehabilitation to integrate the preservation, education, interpretation and administrative needs into a viable management action.

The National Historic Preservation Act (16 USC 470h-29a)(1)) requires federal agencies – before acquiring, constructing, or leasing buildings – to use, to the maximum extent feasible, historic properties available to it whenever operationally appropriate and economically prudent. The Act also requires each agency to implement alternatives for the adaptive use of historic properties it owns if that will help ensure the properties' preservation. Adaptive reuse, the process of adapting old structures for purposes other than those initially intended, is often considered a viable method to promote preservation of historic structures.

## Project Area Location

Pearl Harbor is located on the central leeward coast of the island of Oahu at the southeast end of the Waianae mountain range. It is an active military installation and is managed by Joint Base Pearl Harbor – Hickam. In the center of the harbor is Ford Island, where military residential life and administrative activities occur in close proximity to historic tourist venues (Battleship *Missouri* Memorial, Pacific Aviation Museum and WWII Valor in the Pacific National Monument).

All six CPO bungalows are located on Ford Island immediate adjacent to the USS *Oklahoma* Memorial and the Battleship *Missouri* Memorial. Five of the CPO bungalows (# 28, 29, 31, 32 and 90) are located in a row on the harbor side of Belleau Wood Loop Road. One bungalow (#68) is located immediately across Lexington Road from the USS *Oklahoma* Memorial (Figure 2 and 3).

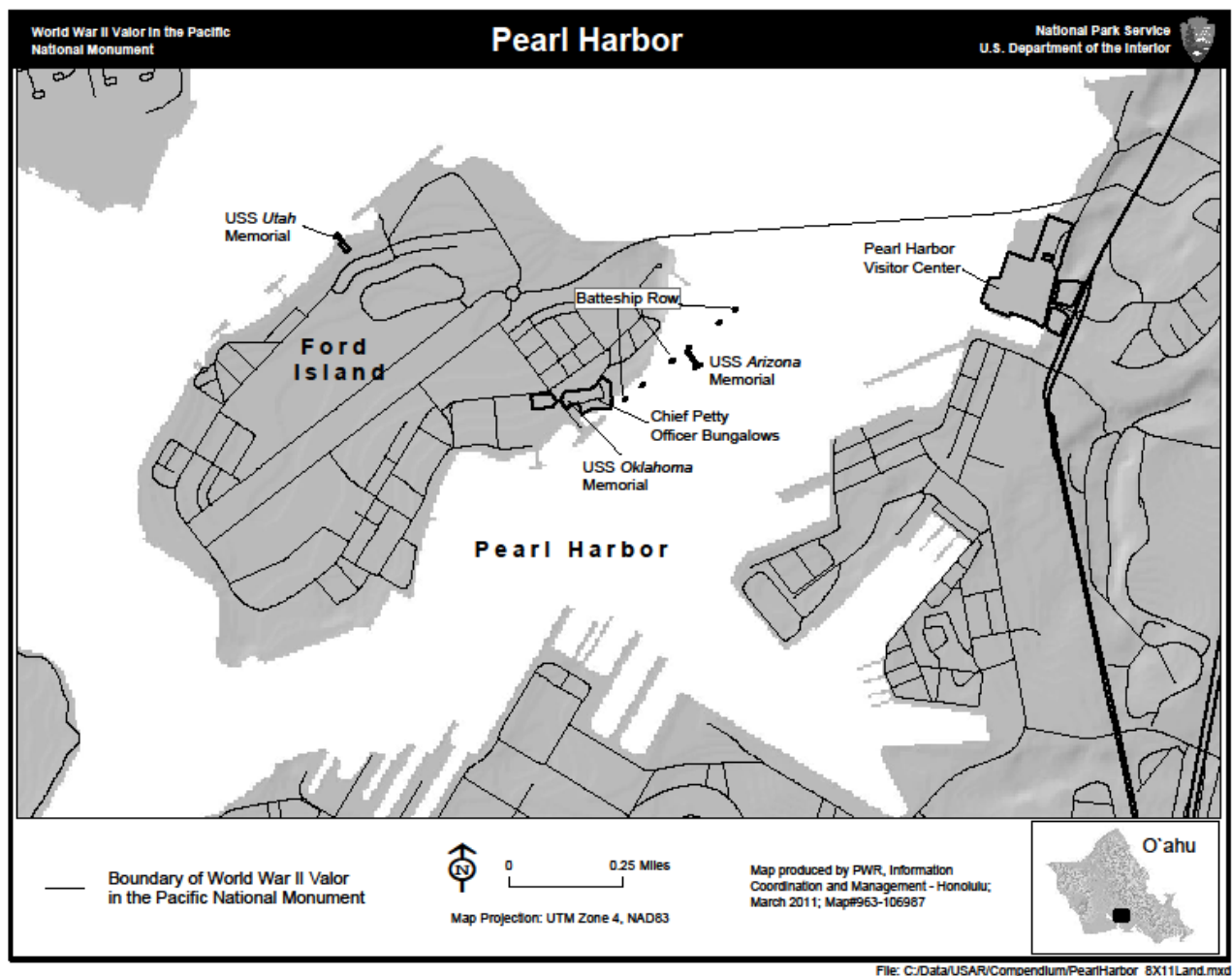


Figure 2. Ford Island and CPO Bungalow Neighborhood



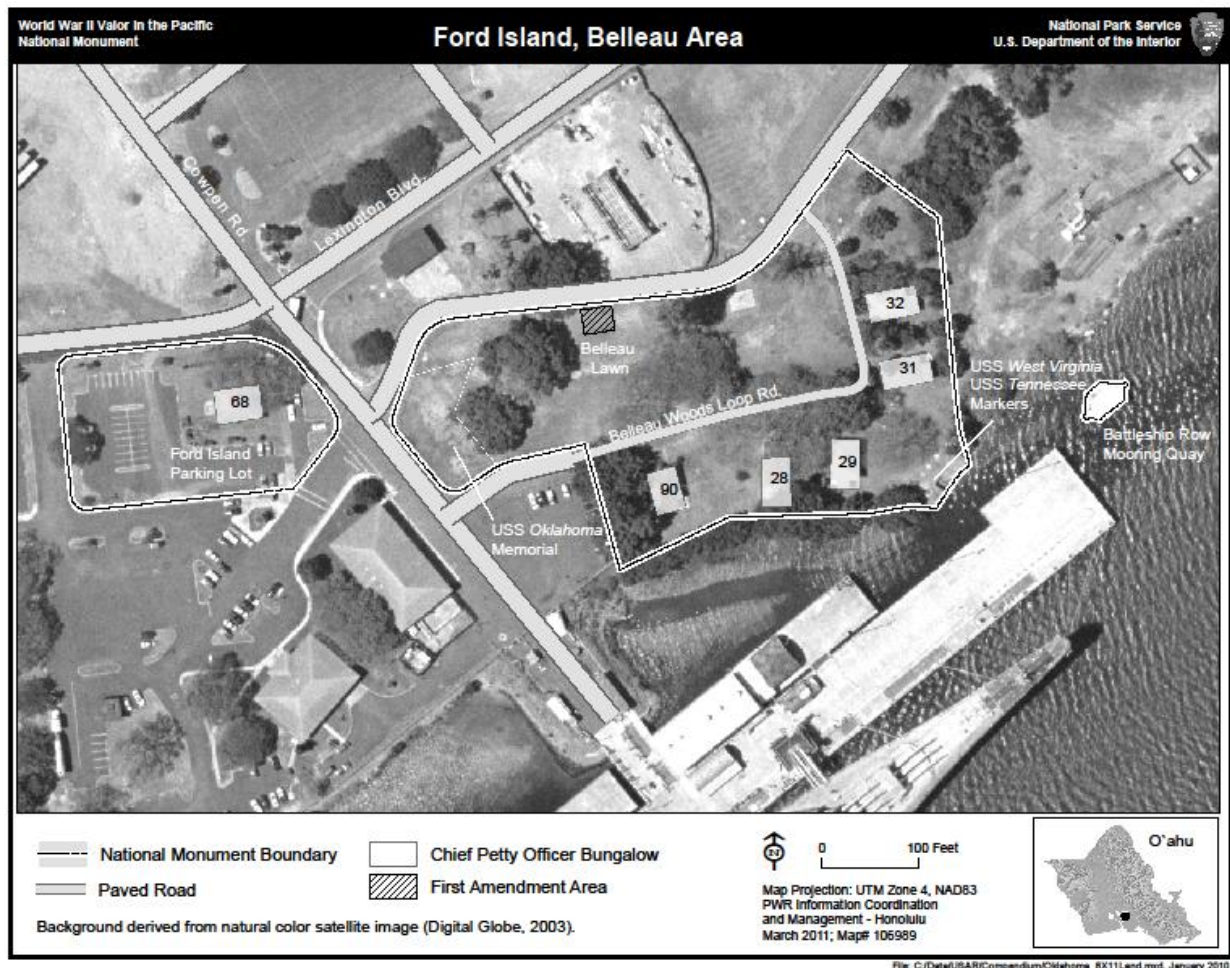


Figure 3. Belleau Woods Neighborhood and CPO Bungalows

## Scope of Environmental Assessment

This Environmental Assessment has been prepared to satisfy the requirements of the National Environmental Policy Act (NEPA) of 1969 (42 U.S.C. 4341 et seq.) as amended in 1975 by P.L. 94-52 and P.L. 94.83. Additional guidance includes NPS Director's Order 12 (NPS, 2001a) which implements Section 102(2) of NEPA and the regulations established by the Council on Environmental Quality (40 CFR 1500-1508). The project must comply with requirements of NEPA as well as other legislation that governs land use, resource protection and other policy issues within the park. This Environmental Assessment also contains information on compliance with Section 106 of the National Historic Preservation Act and Section 7 of the Endangered Species Act.

## **Related Laws, Legislation, NPS Policy and Planning Documents**

### **Authorities**

#### **1916 National Park Service Organic Act**

The key provision of the legislation establishing the National Park Service, referred to as the 1916 Organic Act is: “The National Park Service shall promote and regulate the use of the Federal areas known as national parks, monuments, and reservations hereinafter specified . . . by such means and measures as conform to the fundamental purpose of the said parks, monuments, and reservations, which purpose is to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations (16 USC 1).”

#### **1970 National Park Service General Authorities Act (as amended in 1978 – Redwood Amendment)**

This act prohibits the National Park Service from allowing any activities that would cause degradation of the values and purposes for which the parks have been established (except as directly and specifically provided by Congress in the enabling legislation for the 14 parks). Therefore, all units are to be managed as national parks, based on their enabling legislation and without regard for their individual titles.

#### **2008 Presidential Proclamation 8327-- Establishment of the World War II Valor in the Pacific National Monument**

The 2008 Presidential Proclamation (under the authority of the American Antiquities Act of 1906) established the National Monument and directs the NPS to preserve, interpret, and enhance public understanding and appreciation of the broader stories of the Pacific War.

#### **2009 Evaluating Climate change Impacts in Management Planning (Department of the Interior Secretarial Order 3289)**

This Order provides guidance to bureaus and offices within the Department of the Interior on how to provide leadership by developing timely responses to emerging climate change issues.

#### **2011 Pearl Harbor Historic Sites (Section 121 of Pub. L. No. 111-88 (123 Stat. 2930-31))**

This law authorized the Secretary of the Interior to enter into an agreement with the Pearl Harbor Historic to facilitate admission to those historic venues. In February 2010, an agreement on centralized ticketing from the Pearl Harbor Visitor Center was signed and allows visitors to those historic attractions to gain access to them by passing through security screening at the Visitor Center. Congress amended Section 121 of Pub. L. No. 111-88 (123 Stat. 2930-31) to make this NPS authority permanent. This amendment is contained in Section 1733 of Pub. L. No. 112-10.



## Resource Protection Laws

### **National Environmental Policy Act (NEPA) 42 USC 4341 *et seq.***

NEPA requires the identification and documentation of the environmental consequences of federal actions. Regulations implementing NEPA are set for by the President's Council on Environmental Quality (40 CFR Parts 1500-1508). These regulations establish the requirements and process for agencies to fulfill their obligations under NEPA.

### **Clean Water Act (33 USC 1241 *et seq.*)**

Under this act, it is a national policy to restore and maintain the chemical, physical, and biological integrity of the nation's waters, to enhance the quality of water resources, and to prevent, and control, and abate water pollution. Section 401 of the Clean Water Act as well as NPS policy requires analysis of impacts on water quality. NPS Management Policies provide direction for the preservation, use, and quality of water in national parks.

### **Coastal Zone Management Act**

The U.S. Congress recognized the importance of meeting the challenge of continued growth in the coastal zone by passing the Coastal Zone Management Act (CZMA) in 1972. The Act, administered by NOAA's Office of Ocean and Coastal Resource Management (OCRM), provides for management of the nation's coastal resources, including the Great Lakes, and balances economic development with environmental conservation. The entire state of Hawai'i is within 30 miles of the ocean and is within a single zone. This project is consistent with the stated goals of the Hawai'i Coastal Zone Management Program (1990). In particular, the permissible uses under Conservation "Protection 'P' Subzone" include sites of historic interest.

### **Endangered Species Act (16 USC 1531 *et seq.*)**

The Endangered Species Act (ESA) requires federal agencies, in consultation with the Secretary of the Interior, to use their authorities in the furtherance of the purposes of the act and to carry out programs for the conservation of listed, endangered, and threatened species (16 USC 1535 Section 7(a)(1)). The ESA also directs federal agencies, in consultation with the Secretary of the Interior, to ensure that any action authorized, funded, or carried out by an agency is not likely to jeopardize the continued existence of any endangered or threatened species or result in the destruction or adverse modification of designated critical habitat (16 USC 1535 Section 7(a)(2)). Consultation with the United States Fish and Wildlife Service (USFWS) is required if there is likely to be an effect.

### **National Historic Preservation Act (1966 as amended) (16 USC 470)**

Sections 106 and 110 of the National Historic Preservation Act (NHPA) directs federal agencies to take into account the effect of any undertaking [a federally funded or assisted project] on historic properties. "Historic property" is any district, building, structure, site, or object that is eligible for listing in the National Register of Historic Places because the property is significant at the national, state, or local level in American history, architecture, archeology, engineering, or culture. This section also provides the Advisory Council on Historic Preservation and the State Historic Preservation Officer (SHPO) an opportunity to comment on the undertaking. The 1992 amendments to the act have further defined the roles of American Indian Tribes and the affected public in the Section 106 process.

## Policies

### **National Park Service Management Policies (2006)**

The National Park Service Management Policies updated in 2006 specify the method in which the NPS will provide for the long term preservation of, public access to, and appreciation of the features, materials, and qualities contributing to the significance of cultural resources (5.3.5 Treatment of Cultural Resources).

### **1998 NPS-28 Cultural Resource Management Guideline**

The NPS is charged to preserve cultural resources unimpaired for the enjoyment of present and future generations. Offers guidance in applying other policies to establish, maintain, and refine park cultural resource programs. Cultural resource management involves research, planning and stewardship.

### **1995 The Secretary of the Interior's Standards for the Treatment of Historic Properties**

The Secretary of the Interior's Standards for the Treatment of Historic Properties provides guidance for the preservation, rehabilitation, restoration and reconstruction of historic structures.

## Agreements

### **2010 Pearl Harbor Historic Sites Cooperative Agreement**

The NPS and the Pearl Harbor Historic Sites partners will cooperate on the operation of a visitor shuttle between the Pearl Harbor Visitor Center and Battleship *Missouri* Memorial.

## Plans

### **2002 Ford Island Development Plan**

This planning document was developed by the Navy to consolidate selected military operations at Pearl Harbor by locating and relocating certain activities onto Ford Island.

### **2005 Criteria for Memorials within the Pearl Harbor Naval Complex**

This planning document was developed by the Navy to address requests for constructing memorials at Pearl Harbor. The plan identifies appropriate themes by zone within the Pearl Harbor Naval Complex. This plan reserves delineation of special criteria to the National Park Service for the area it managed.

### **2008 Integrated Cultural Resources Management Plan for the Pearl Harbor Naval Complex**

This plan addresses the management of cultural resources on Ford Island and at Iroquois Point/Pu'uloa Housing. This document provides planning guidelines to avoid or minimize significant impacts.

### **2011 Pearl Harbor Naval Complex Cultural Landscape Report**

This report documents the physical development of the land and water areas of the Pearl Harbor Naval Complex that are owned and managed by the US Navy. It provides the documentation needed to guide management of cultural landscape resources as well as direct

long-term planning efforts. The report describes the evolution of the cultural landscape from its pre-military occupation and land use, followed by the establishment as a Navy base in the early 1900s to the present.

## **Issues and Impact Topics**

Specific impact topics were developed to address potential natural, cultural, recreational, and park operations impacts that might result from the proposed alternatives as identified by the public, NPS, and other agencies, and to address federal laws, regulations and orders, and NPS policy. During public scoping, topics of interest included preservation of cultural resources, vegetation management and visitor experience. A brief rationale for the selection or non-selection of each impact topic is given below and addressed more fully.

### **Impact Topics Analyzed in this Document**

#### **Natural Resources**

##### ***Vegetation***

The National Environmental Policy Act (NEPA) calls for examination of the impacts on the components of affected ecosystems. NPS policy is to protect the natural abundance and diversity of park native species and communities, including avoiding, minimizing or mitigating potential impacts from proposed projects.

##### ***Wildlife and Fish***

The National Environmental Policy Act (NEPA) calls for examination of the impacts on the components of affected ecosystems. NPS policy is to protect the natural abundance and diversity of park native species and communities, including avoiding, minimizing or mitigating potential impacts from proposed projects.

#### **Scenic Resources**

Scenic resources include scenic vistas and overlooks, unique topography, or visual landmarks having scenic value. Mature trees can be contributing elements to this resource. Management Policies and the NPS Organic Act identify the need to protect the scenic values of parks.

#### **Cultural Resources**

NPS Management Policies categorizes cultural resources as archeological resources, cultural landscapes, structures/buildings, museum objects, and ethnographic resources.

##### ***National Historic Landmark***

National Historic Landmarks (NHL) are nationally significant historic places designated by the Secretary of the Interior because they possess exceptional value or quality in illustrating or interpreting the heritage of the United States. Today, fewer than 2,500 historic places bear this national distinction.

### ***Pre-contact and Historic Archeological Resources***

Conformance with the Archeological Resources Protection Act in protecting known or undiscovered archeological resources is necessary.

### ***Historic Buildings and Structures***

The National Park Service defines buildings and structures as, “an enclosed structure with walls and a roof, consciously created to serve some residential, industrial, commercial, agricultural, or other human use,” and “a constructed work, usually immovable by nature or design, consciously created to serve some human activity. Examples are buildings of various kinds, monuments, dams, roads, railroad tracks, canals, millraces, bridges, tunnels, locomotives, nautical vessels, stockades, forts and associated earthworks, Indian mounds, ruins, fences, and outdoor sculpture. In the National Register program "structure" is limited to functional constructions other than buildings,” respectively (NPS-28, Cultural Resource Management Guideline).

### ***Park Operations***

#### ***Visitor Experience***

Providing for visitor enjoyment is one of the fundamental missions of the NPS, according to the Organic Act of 1916 and Management Policies (NPS 2006). Dependent on the selected alternative, impacts to visitor use and/or interpretive programming may occur.

#### ***Maintenance***

Impacts to maintenance and visitor services are often considered in project plans to disclose the degree to which proposed actions would change park management strategies and methods.

#### ***Safety/Security***

Safety is critical to a positive visitor experience. Accurate directional and information signs, reasonable grades, and warning about natural hazards such as fallen trees and uneven surfaces, all increase visitor safety and can mean the difference between a pleasant visitor experience or one remembered negatively. Providing for the safety and security of visitors and resources alike is one of the fundamental missions of the NPS.

## **Impact Topics Dismissed From Further Analysis**

The topics listed below either would not be affected or would be affected only negligibly by the alternatives evaluated in this process for selecting an alternative. Therefore, these topics have been dismissed from further analysis. Negligible effects are localized effects that would not be detectable over existing conditions.

### ***Geology and Soils/ Geologic and Associated Hazards***

Extensive soil excavation and fill activities have taken place in the project area. Much of the Ford Island shoreline was reclaimed with fill in the past 70 years to increase usable area. Little to no intact soils are present in the project area. Subsidence, while a problem at the Visitor

Center on Oahu, has not been a problem on Ford Island. Therefore, this topic was dismissed from further analysis.

### **Tsunami**

NOAA's Center for Tsunami Research completed a comprehensive tsunami modeling study for Pearl Harbor. The study concludes that the risk of a destructive tsunami inside Pearl Harbor is low. Model results show minor inundation even for the worst case scenario (NOAA 2006). Additionally, storm tidal inundation frequency is inconsequential at this location on Ford Island. Therefore, this topic was dismissed from further analysis.

### **Special Status Species**

The Endangered Species Act (ESA) requires an examination of impacts to all federally listed threatened or endangered species. NPS policy also requires an analysis of impacts to state-listed threatened or endangered species and federal candidate species. Under the ESA, the NPS is mandated to promote the conservation of all federal threatened and endangered species and their critical habitats within the park boundary. Management Policies include the additional stipulation to conserve and manage species proposed for listing. There are currently no identified state or federal special status species within the project area (Nadig 2011). Therefore, this topic was dismissed from further analysis.

### **National Wild and Scenic Rivers**

The National Wild and Scenic Rivers Act requires analysis of impacts to designated, eligible or proposed National Wild and Scenic Rivers. There are no designated wild and scenic rivers at WWII Valor in the Pacific National Monument. Therefore, this topic was dismissed from further analysis.

### **Water Resources**

The 1972 Federal Water Pollution Control Act, as amended by the Clean Water Act of 1977, is a national policy to restore and maintain the chemical, physical, and biological integrity of the nation's waters, to enhance the quality of water resources, and to prevent, and control, and abate water pollution. NPS Management Policies provide direction for the preservation, use, and quality of water in national parks. This project will follow all laws for preservation of water integrity. Therefore, this topic is dismissed from further analysis.

### **Floodplain Management**

Executive Order 11988 requires an examination of impacts to floodplains and potential risk involved in placing facilities within floodplains. The project area is not a designated floodplain. Therefore, this topic was dismissed from further analysis.

### **Wilderness**

The Wilderness Act of 1964 requires that impacts to Wilderness be assessed. There are no designated wilderness lands within WWII Valor in the Pacific National Monument. Therefore, wilderness was dismissed as an impact topic.

### **Wetlands**

Executive Order 11990 requires that impacts to wetlands be addressed. Lack of wetland indicators (presence of wetland plants, water ponding, soil gleying/mottling) show wetlands are not present within the analysis area; therefore, affects on wetlands were dismissed as an impact topic.

### **Air Quality**

The Clean Air Act states that park managers have an affirmative responsibility to protect park air quality related values (including visibility, plants, animals, soils, water quality, cultural resources and visitor health) from adverse air pollution impacts. Short-term impacts from construction activities would include emissions from vehicles and generation of fugitive dust. The alternatives considered would have only negligible impacts on air quality so this topic was dismissed from further analysis.

### **Land Use**

The NPS is responsible to identify any possible conflicts between the proposed action and land use plans, policies, or controls for the area concerned (including local, state, or Indian tribe) and the extent to which the park will reconcile the conflict. Land use of WWII Valor in the Pacific National Monument and actions proposed in the alternatives would not be in conflict with any local or state land use plans, policies, or controls for the area. Any changes to WWII Valor in the Pacific National Monument as proposed in the alternatives, would be consistent with the existing land uses in the Monument or local land use plans. Therefore, this topic is dismissed from further consideration.

### **Energy Requirements and Conservation Potential**

Any rehabilitation to the CPO bungalows with inherent energy needs proposed in the alternatives would be designed with long-term sustainability in mind. The NPS has adopted the concept of sustainable design as a guiding principle of facility planning and development (Management Policies 9.1.1.7). The action alternatives could result in an increased energy need, but this is expected to be negligible using sustainable practices and as when seen in the regional context. Thus, this topic is dismissed from further analysis.

### **Natural or Depletable Resource Requirements and Conservation Potential**

The NPS has adopted the concept of sustainable design as a guiding principle of facility planning and development (NPS Management Policies 9.1.1.7). The objectives of sustainability are to design facilities to minimize adverse effects on natural and cultural values, to reflect their environmental setting and to maintain and encourage biodiversity, to operate and maintain facilities to promote their sustainability, and to demonstrate and promote conservation principles and practices through sustainable design and ecologically sensitive use. None of the alternatives would substantially affect the park's energy requirements because any rehabilitated facilities would take advantage of energy conservation methods and materials. Through sustainable design concepts and other resources management principles, the alternatives analyzed in this document would attempt to conserve natural or depletable resources. Therefore, this topic is dismissed from further analysis.

### **Prime and Unique Farmlands**

No prime or unique agricultural soils exist at WWII Valor in the Pacific National Monument. Therefore, this topic was eliminated from further consideration.

### **Ethnographic Resources**

The National Park Service defines ethnographic resources as any “site, structure, object, landscape, or natural resource feature assigned traditional legendary, religious, subsistence, or other significance in the cultural system of a group traditionally associated with it” (NPS-28, Cultural Resource Management Guideline). There are no known ethnographic resources that would be impacted by this project. Therefore, this topic was dismissed from further analysis.

### **Museum Objects**

Requirements for proper management of museum objects are defined in 36 CFR 79 and promulgated in the NPS Museum Handbook. Management Policies (NPS 2006) and other cultural resources laws identify the need to evaluate effects on National Park Service Collections as applicable. No museum objects will be used for this project. Therefore, this topic was dismissed from further analysis.

### **Indian Trust Resources**

Secretarial Order 3175 requires that any anticipated impacts to Indian trust resources from a proposed project or action by Department of Interior agencies be explicitly addressed in environmental documents. The federal Indian trust responsibility is a legally enforceable fiduciary obligation on the part of the United States to protect tribal lands, assets, resources, and treaty rights, and it represents a duty to carry out the mandates of federal law with respect to American Indian and Alaska Native tribes. There are no Indian trust resources at WWII Valor in the Pacific National Monument. The lands comprising the park are not held in trust by the Secretary of the Interior for the benefit of Indians due to their status as Indians. Therefore, Indian Trust Resources were dismissed as an impact topic.

### **Environmental Justice**

Executive Order 12898, “General Actions to Address Environmental Justice in Minority Populations and Low-Income Populations,” requires all federal agencies to incorporate environmental justice into their missions by identifying and addressing disproportionately high and adverse human health or environmental effects of their programs and policies on minorities and low-income populations and communities. The proposed action would not have disproportionate health or environmental effects on minorities or low-income populations or communities as defined in the Council for Environmental Quality’s Environmental Justice Guidance (CEQ 1997). Therefore, environmental justice was dismissed as an impact topic.

# DESCRIPTION OF ALTERNATIVES

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This section describes the alternatives considered, including the No Action Alternative. The alternatives described in this chapter include mitigation and monitoring activities proposed to minimize or avoid environmental impacts. This section also includes a description of alternatives considered early in the planning process but later eliminated from further study; reasons for their dismissal are provided.

## Alternatives Considered But Rejected

Under the National Environmental Policy Act (NEPA) [40 CFR 1504.14 (a)] alternatives may be eliminated from detailed study if they:

- Are technically or economically infeasible;
- Cannot meet project objectives or resolve need for the project;
- Duplicate other less environmentally damaging alternatives;
- Conflict with an up-to-date valid plan, statement of purpose and significance, or other policy; and therefore, would require a major change in that plan or policy to implement; and Cause environmental impacts which are deemed too great.

Early in the planning process an alternative that would focus the rehabilitation and restoration of the CPO bungalows for the sole purpose of National Park Service administrative use was considered. After further review from both internal NPS staff and the public it was determined that utilizing these significant historic buildings for only administrative purposes with no public interpretation or education component would go against the mission of the NPS. Not having any level of public interpretation or education at this site would be a disservice to the historic structures and the important stories that they can help to illustrate.

## Alternatives Retained

The alternatives were developed from collaborative analysis based on the expertise of interdisciplinary planning team members within the National Park Service and during public scoping meetings with federal, state and local agencies, and other interested organizations and individuals. The alternatives are summarized in Table 2.

### Alternative A – No Action

Under this alternative, no restoration or rehabilitation of the CPO bungalows would occur. Minimal stabilization would continue, if possible, but likely would result in continued deterioration of the historic fabric.



## Alternative B – Rehabilitation of CPO Bungalows with Visitor Focus

Under Alternative B, the CPO Bungalows would be rehabilitated and maintained to exhibit historic integrity both on the building exteriors and interiors. The focus of this alternative is to provide opportunities for visitors to experience and learn about the human component to the Pacific War. This alternative would provide an enhanced visitor experience through extensive internal exhibits, exterior exhibits, passive wayside exhibits and regular ranger led programs.

## Alternative C – Rehabilitation of CPO Bungalows with Combined Visitor and Administrative Focus (preferred)

Under Alternative C, the CPO Bungalows would retain as much historic fabric through rehabilitation as possible while accommodating opportunities for visitors to experience and learn (through interpretive exhibits) and for NPS administrative needs (uses such as office, residence, storage). This alternative provides opportunities for both education and interpretation and administrative needs.

Table 2. Alternative Comparison

Project Components	Alternative A -- No Action	Alternative B – Rehabilitation with visitor focus	Alternative C – Rehabilitation with combined visitor and administrative focus (preferred)
<b>Vision</b>	Continue current management with limited/minimal interpretation and continuous stabilization of structures.	Bungalows exhibit historic integrity both on the exterior and interior. Opportunities for visitors to experience and learn about human component to Pacific War.	Bungalows retain as much historic fabric through rehabilitation as possible while accommodating opportunities for visitors to experience and learn (internal exhibits) and for NPS administrative needs (office, residence, storage).
<b>Major Differences</b>	Minimal utilization of the buildings.	Many opportunities for education and interpretation. Primary administrative needs support interpretation and education functions.	Opportunities for both education and interpretation and administrative needs.
	Continued deterioration of the buildings would result.		
	Minimal interpretation through passive wayside exhibits and intermittent ranger led programs.	Enhanced visitor experience through extensive internal exhibits, exterior exhibits, passive wayside exhibits and regular ranger led programs.	Opportunities for education and interpretation through internal and external exhibits, wayside exhibits and ranger led programming.
	Minimal stabilization. Little change from current condition.	Highest level of historic preservation through exterior finishes and interior exhibits.	High level of historic preservation through retention of historic fabric, exterior finishes and partial interior exhibits. Adaptive re-use may include structural modifications.
<b>Historic Preservation</b>	Minimal stabilization efforts on a continuous basis.	Highest level of historic preservation.	High level of historic preservation.

<b>Project Components</b>	<b>Alternative A -- No Action</b>	<b>Alternative B – Rehabilitation with visitor focus</b>	<b>Alternative C – Rehabilitation with combined visitor and administrative focus (preferred)</b>
	Risk loss of historic fabric due to deterioration.	Rehabilitation and/or restoration of exterior finishes and interiors following Secretary of Interior's Standards for Historic Preservation.	Rehabilitation and/or restoration of exterior finishes and some interiors following Secretary of Interior's Standards for Historic Preservation
<b>Interpretation &amp; Education</b>	Minimal interpretation through passive wayside exhibits and intermittent ranger led programming	Wide range of opportunities for both interior and exterior interpretation and educational programs – could include exhibit gallery spaces, period interior and exterior exhibits and living history presentations in outdoor areas. Possible construction of compatible exterior exhibits (i.e. structures) to enhance interpretation.	Moderate range of opportunities for interpretation through exterior finishes, wayside exhibits, regular ranger led programming and exhibits inside and surrounding the structures.
<b>Historic Landscape &amp; Setting</b>	Current management of maintaining existing plantings that do not present a danger to the historic fabric of the bungalows. Manage vegetation for human safety.	Landscape elements are primarily managed to best preserve the historic scene, the integrity of the buildings and visitor/employee safety. Could include additional plantings or plant removal that enhances the setting as a Battleship Row neighborhood.	Combination of preserving historic scene, maintaining the integrity of the buildings and providing for visitor/employee safety. Could include additional plantings or plant removal that enhances the setting as a Battleship Row neighborhood.
<b>Administrative Use</b>	Currently, minimal storage of equipment and supplies.	Could include use as a visitor contact station with continued use of minimal storage for equipment and supplies.	Structures would be used to support both visitor contact/interpretation purposes as well as for administrative needs (offices, storage and residence(s)).
<b>Accessibility Standards (ABAAS Architectural Barriers Act Accessibility Standard)</b>	Buildings and grounds would not meet ABAAS standards.	ABAAS Accessibility standards would need to be met in order to provide visitor and staff access into structures and throughout grounds.	ABAAS Accessibility standards would need to be met in order to provide visitor and staff access into structures and throughout grounds.
<b>Utilities (Water, Septic, Electricity, Communications)</b>	Electricity is needed where minimal storage uses occur. Also, may require security surveillance.	All utilities are required in structures where visitor access is anticipated. Electrical utilities in structures with no visitor access. Additional restroom capacity would be required to support higher visitation numbers.	All utilities are required in structures where visitor access and staff use is anticipated. Electrical utilities in structures with no visitor access and limited staff use.

<b>Project Components</b>	<b>Alternative A -- No Action</b>	<b>Alternative B – Rehabilitation with visitor focus</b>	<b>Alternative C – Rehabilitation with combined visitor and administrative focus (preferred)</b>
<b>Public Access</b>	No public access to interior of buildings.	Visitor Access (to some structures) with monitoring. Primary mode of access is through the Ford Island Shuttle from Pearl Harbor Visitor Center. Limited parking for personal vehicles.	Staff and Visitor Access with monitoring. Primary mode of access is through the Ford Island Shuttle from Pearl Harbor Visitor Center. Limited parking for personal vehicles.
<b>Physical Security</b>	Current minimal levels of regular patrols by NPS and Navy law enforcement.	Moderate levels of physical security through regular patrols by NPS and Navy law enforcement and the addition of surveillance.	High levels of physical security through regular patrols by NPS and Navy law enforcement and the addition of surveillance. Office and residential uses increase physical security through on site presence of caretaker functions.

### **The Environmentally Preferred Alternative**

As described in the National Environmental Policy Act (NEPA) of 1969, the Environmentally-Preferred Alternative is the alternative that would:

1. Fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;
2. Ensure for all Americans, safe, healthful, productive and aesthetically and culturally pleasing surroundings;
3. Attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences;
4. Preserve important historic, cultural and natural aspects of our natural heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice;
5. Achieve a balance between population and resource use that will permit high standards of living and a wide sharing of life's amenities;
6. Enhance the quality of renewable resources and approach the maximum attainable recycling of deplete-able resources.

The environmentally preferred alternative is determined by applying these criteria as suggested in the National Environmental Policy Act of 1969.

Although all alternatives provide some environmentally preferred benefits, the National Park Service has identified Alternative C as the Environmentally Preferred Alternative because it may achieve a high degree of historic and cultural preservation and has the widest range of beneficial uses.

## Actions Common to Alternatives B and C

### Secretary of the Interior's Standards for Historic Preservation

For both alternatives B and C, any treatment applied to the CPO bungalows would be designed and constructed in accordance with the Secretary of the Interior's *Standards for Historic Preservation* (1995). The four treatment approaches are Preservation, Rehabilitation, Restoration, and Reconstruction, outlined below in hierarchical order and explained:

The first treatment, **Preservation**, places a high premium on the retention of all historic fabric through conservation, maintenance and repair. It reflects a building's continuum over time, through successive occupancies, and the respectful changes and alterations that are made.

**Rehabilitation**, the second treatment, emphasizes the retention and repair of historic materials, but more latitude is provided for replacement because it is assumed the property is more deteriorated prior to work. (Both Preservation and Rehabilitation standards focus attention on the preservation of those materials, features, finishes, spaces, and spatial relationships that, together, give a property its historic character.)

**Restoration**, the third treatment, focuses on the retention of materials from the most significant time in a property's history, while permitting the removal of materials from other periods.

**Reconstruction**, the fourth treatment, establishes limited opportunities to re-create a non-surviving site, landscape, building, structure, or object in all new materials.

### Additional Guidelines Developed Through the NHPA Section 106 Process

Discussion with the Advisory Council on Historic Preservation (ACHP) and the Hawaii State Historic Preservation Division (SHPD) led to a determination that a Programmatic Agreement (PA) under Section 106 of the National Historic Preservation Act was the appropriate method for avoiding adverse effects. The development of a PA was determined because the project is expected to be implemented in phases, funding is uncertain and the effects of individual projects on historic properties cannot be fully determined at this time. The PA will stipulate guidance for the preservation of the CPO bungalows as well as outline the on-going Section 106 process. The NPS determined that this PA would serve as a long-term tool to guide the preservation efforts since the project is expected to take a number of years to complete (Appendix D).

### Accessibility

As required by the Architectural Barriers Act of 1968 (P.L. 90-480), the Rehabilitation Act of 1973 (P.L. 93-112), the 1984 Uniform Federal Accessibility Standards (UFAS) (49 CFR 31528), and NPS Director's Order #42: Accessibility for Visitors with Disabilities in National Park Service Programs and Services, the Memorial will meet all standards for accessibility to persons with disabilities as outlined in the New ADA-ABA Accessibility Guidelines, effective May, 2006.

## Safety

During any construction associated with the preservation, rehabilitation or restoration of the CPO bungalows, all contractors will comply with NPS Director's Order #50B: Occupational Safety and Health Program, Section 7.0, Contractor Safety, effective September 2008.

# AFFECTED ENVIRONMENT

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For the purposes of this project the discussion of the affected environment will concentrate on the approximately four acres area that encompasses the Belleau Loop neighborhood of CPO bungalows (# 28, 29, 31, 32 & 90) and bungalow #68 (located across Cowpens Street) within the National Monument boundary on Ford Island (Figure 2).

## Natural Resources

### Vegetation

Healthy tropical vegetation is located throughout the project area. Plants located within the project area contain both non-indigenous and indigenous species which are not rare to the area. Most of the flora is non-indigenous to the geographic region of Hawaii. The stands of trees are typically made up of a mixture of kiawe (*Prosopis pallida*), milo (*Thespesia populnea*) and mangrove (*Rhizophora mangle*). The dominant shrub species arekoa-haole (*Leucaena leucocephala*), Cuba jute (*Sida rhombifolia*), 'uhaloa (*Waltheria indica*) and 'ilima (*Sida fallax*). The primary grass species on Ford Island is pitted beardgrass (*Bothriochloa pertusa*).

### Wildlife and Fish

Wildlife commonly found in the coastal vicinity of the project area includes various birds, and small mammals. The animals in the area are not listed as endangered or rare to the area. There are no sensitive habitats such as wetlands or marshes on Ford Island and no threatened or endangered species inhabit the island. Documentation of the Section 7 consultation with the US Fish and Wildlife Service (Nadig 2011) is in Appendix B.

#### Birds

##### Indigenous:

- Kolea or Pacific Golden Plover (*Pluvialis fulva*)
- Black-Crowned Night Heron (*Nycticorax nycticorax*)

##### Non-native:

- Bulbul, Red-vented (*Pycnonotus cafer*)
- Bulbul, Red-whiskered (*Pycnonotus jocosus*)
- Dove, Barred or Zebra (*Geopelia striata*)
- Dove, Chinese or Spotted (*Streptopelia chinensis*)
- Japanese White-Eye or Mejiro (*Zosterops japonicus*)
- Mannikin, Chestnut (*Lonchura Malacca*)
- Myna (*Acridotheres tristis*)

Sparrow, Java (*Padda oryzivora*)  
Cardinal, Northern (*Cardinalis cardinalis*)  
Cardinal, Red-Crested (*Paroaria coronata*)  
Egret, Cattle (*Bubulcus ibis*)  
Sparrow, House or English (*Passer domesticus*)  
'Iwa or Great Frigate Bird (*Fregata minor palmerstoni*)

## **Mammals**

Feral cat (*Felis catus*).  
Polynesian rat (*Rattus exulans*)  
Norway rat (*R. norvegicus*)  
Roof rat (*R. rattus*)  
Mongoose (*Herpestes edwardsii*)

## **Scenic Resources**

Scenic resources associated with Ford Island include scenic vistas including the Ko'olau Range and the Pearl Harbor National Historical Landmark of which the CPO bungalow neighborhood is a part. The Landmark viewshed includes Pearl Harbor, military vessels and memorials (i.e. the Battleship *Missouri* and USS *Arizona* Memorials).

## **Cultural Resources**

NPS Management Policies categorizes cultural resources as archeological resources, cultural landscapes, structures/buildings, museum objects, and ethnographic resources. This project focuses strongly on the preservation of the historically significant CPO bungalows.

## **National Historic Landmark Status**

The CPO bungalow neighborhood is located within the boundaries of the United States Naval Base, Pearl Harbor National Historic Landmark (NHL) boundary and is a contributing site in the landmark. The NHL encompasses the entire national monument. The USS *Arizona* and the USS *Utah* wrecks and the USS *Bowfin* are also National Historic Landmarks and within the vicinity of the project area.

The U.S. Naval Base Pearl Harbor National Historic Landmark was designated on January 29, 1964. Pearl Harbor was one of the principal reasons for early American interest in Hawaii. The development of a naval base and headquarters here were important factors in the rise of U.S. naval power in the Pacific. The dispute of this power by Japan contributed to the precipitation of war between the United States and Japan, the significant opening shots of which occurred at Pearl Harbor on the morning of December 7, 1941. Ford Island, most well-known as the location of Battleship Row, suffered devastating damage during the Japanese attack on December 7, 1941. Evidence of the attack can still be seen. The CPO Bungalow area contributes to an understanding of the era just before, during and immediately after the Pacific War.

## Pre-contact and Historic Archeological Resources

There is little specific information on how Ford Island was used in the pre-contact (prior to 1877) and early post-contact periods. The lack of water on the island may have prohibited pre-contact habitation, resulting in only short-term activities such as fishing, pili grass collection and dry-land crops such as sweet potato.

Currently there are no known existing archeological sites in the area of the CPO bungalows. A review of site potential (Erkelens, 1998) suggests that sugarcane cultivation and military construction destroyed any sites that might have existed, except for what might be in buried limestone sinkholes or caves.

## Historic Buildings and Structures

Bungalows -- The bungalows are small one story single-wall houses arranged in an “L” pattern neighborhood along Belleau Wood Loop Road. Each building has a rectangular footprint with an extension attached to the rear, a hipped roof with wood or asphalt shingles and is supported on concrete piers. Interior spaces are divided into two bedrooms, bathroom, kitchen, and living room with painted wood board walls, ceilings and floors. The rear extension functions as a laundry area.

All of the bungalows have been altered in varying degrees from their original design to accommodate modern living. Bungalows 90 and 28 have the floor plans and finishes of the war era. Bungalow 29 has only the floor plan of the war era and will need finishes replaced. Bungalows 31 and 32 have the least amount of historic integrity and will require significant restoration.

The Belleau Woods Loop Road is the access road for the five CPO bungalows nearest the shore. The road surface is asphalt, but is in poor condition from lack of maintenance and damage from large tree roots.

USS *West Virginia* and USS *Tennessee* historical marker is located between bungalows #29 and #31. The art deco style marker was designed by the Public Works Center, 14<sup>th</sup> Naval District and installed in 1949.

There is a pair of bollards along the shoreline adjacent to the historic marker for the USS *West Virginia* and USS *Tennessee*. The bollards likely were placed there from one of the mooring quays from Battleship Row.

## Park Operations

### Visitor Experience

Currently there is very limited self-guided access to the exteriors of the CPO bungalows.



### **Maintenance**

Current maintenance has been emergency stabilization and minimal routine grounds maintenance.

### **Safety/Security**

The CPO bungalows are locked and secured. Access to Ford Island is restricted.

# ENVIRONMENTAL IMPACT ANALYSIS

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The National Environmental Policy Act (NEPA) requires that environmental documents disclose the environmental impacts of the proposed federal action, reasonable alternatives to that action, and any adverse environmental effects that cannot be avoided should the proposed action be implemented. This section analyzes the environmental impacts of two project alternatives and a no-action alternative on park resources.

These analyses provide the basis for comparing the effects of the alternatives. NEPA requires consideration of impacts (direct, indirect and cumulative), the significance of the impacts (context and intensity) as well as measures to mitigate impacts. This document presents an analysis of what impacts can be expected under each of the alternatives discussed in this document. Through presenting impact analysis, the reader—and decision-makers—are better prepared to weigh advantages and disadvantages of the different alternatives.

Each alternative is evaluated in terms of the impacts the proposed actions would have on the affected environment described above. A description of the methods for determining impacts to an affected environment is listed below, followed by an assessment of the environmental impacts for each alternative.

## Methodology

The environmental consequences for each impact topic were defined based on the following information regarding context, type of impact, duration of impact, area of impact and the cumulative impact.

## Type of Impact

A measure of whether the environmental impact will improve or harm the resource and whether that harm occurs immediately or at some later point in time.

## Beneficial

Reduces or improves the environmental impact being discussed.

## Adverse

Increases or results in environmental impact being discussed. It should be noted that preparation of this EA also includes analysis of effects pursuant to Section 106 (National Historic Preservation Act).

### **Direct**

Caused by and occurring at the same time and place as the action, including such environmental impacts as animal and plant mortality, damage to cultural resources, etc.

### **Indirect**

Caused by the action, but occurring later in time or further removed in distance, but are still reasonably foreseeable, including changes in species composition, vegetation structure, range of wildlife, offsite erosion or changes in general economic conditions tied to park activities.

## **Intensity (except Cultural Resources)**

### **Negligible**

Measurable or anticipated degree of change would not be detectable or would be only slightly detectable. Localized or at the lowest level of detection.

### **Minor**

Measurable or anticipated degree of change would be have a slight effect, causing a slightly noticeable change of approximately less than 20 percent compared to existing conditions, often localized.

### **Moderate**

Measurable or anticipated degree of change is readily apparent and appreciable and would be noticed by most people, with a change likely to be between 21 and 50 percent compared to existing conditions. Can be localized or widespread.

### **Major**

Measurable or anticipated degree of change would be substantial, causing a highly noticeable change of approximately greater than 50 percent compared to existing conditions. Often widespread.

## Cultural Resources Intensity

Table 3. Cultural Resource Intensities

Descriptive Terms Defining Impacts to Cultural Resources	
<i>Negligible:</i>	The impact is at the lowest level of detection or barely measurable, with no perceptible consequences, either adverse or beneficial, to cultural resources. For purposes of Section 106, the determination of effect would be <i>no historic properties effected</i> .
<i>Minor:</i>	The impact would affect historic properties with the potential to yield information important in prehistory or history. The historic context of the affected site(s) would be local. For purposes of Section 106, the determination of effect would be <i>no adverse effect</i> .
<i>Moderate:</i>	The impact would affect historic properties with the potential to yield information important in prehistory or history. For a National Register eligible or listed historic district, the impact is readily apparent, and/or changes a character-defining feature(s) of the resource to the extent that its National Register eligibility is jeopardized. For purposes of Section 106, the determination of effect would be <i>adverse effect</i> .
<i>Major:</i>	The impact would affect historic properties with the potential to yield important information about human history or prehistory. The impact is severe for eligible or listed historic districts. The impact changes a character defining feature of the resource, diminishing the integrity of a National Register eligible or listed resource to the extent that it is no longer eligible or listed on the National Register. For purposes of Section 106, the determination of effect would be <i>adverse effect</i> .

### Duration of Impact

Duration is a measure of the time period over which the effects of an impact persist. The duration of impacts evaluated in this EA may be one of the following:

#### Short-term

Often quickly reversible and associated with a specific event, one to five years.

#### Long-term

Reversible over a much longer period, or may occur continuously based on normal activity, or for more than five years.

### Area of Impact

Area of impact is the setting within which impacts are analyzed – such as the project area or region, or for cultural resources – the Area of Potential Effects. For this project the area of impact can be either localized or widespread.

*The localized area of impact* is defined as the Belleau Loop neighborhood of CPO Bungalows (# 28, 29, 31, 32 & 90) and bungalow #68 (located in the vicinity across Cowpen Street) and associated features (access road, walking paths, vegetation, etc.) within the National Monument boundary on Ford Island (Figure 1 and 2).

**Widespread area of impact** is defined as Ford Island. Detectable on a landscape scale (beyond the affected site).

## Cumulative Impacts

Cumulative impacts are the effects on the environment that would result from the incremental impacts of the action when added to other past, present and reasonably foreseeable future actions. Impacts are considered cumulative regardless of what agency or group (federal or non-federal) undertakes the action.

The cumulative impacts addressed in this analysis include past and present actions, as well as any planning or development activity currently being implemented or planned for implementation in the reasonably foreseeable future. Past, present and future projects are defined in Table 4. Cumulative actions are evaluated in conjunction with the impacts of an alternative to determine if they have any additive effects on a particular resource.

**Table 4. Cumulative Actions and Potentially Affected Resources (localized to the project area)**

Action	Description	Resources Potentially Affected
<b>Past Projects</b>		
Emergency stabilization of CPO bungalows	When the NPS acquired the bungalows emergency stabilization to abate pests and slow further deterioration was performed.	Historic structures
Vegetation Management	Vegetation around the bungalows has been periodically maintained to prevent overgrowth.	Historic structures Scenic viewshed
<b>Present Projects</b>		
Ford Island Historic Interpretive Trail	When completed, the trail will present the history of Ford Island from pre-contact to the present. A series of paths will circle the island and interpretive panels along the trail will detail historic themes on the island.	Prehistoric and historic archeological resources
Vegetation Management	Continued vegetation management to inhibit over growth and pests.	Historic structures Prehistoric and historic archeological resources
Access Road Maintenance	Asphalt on existing Belleau Woods Loop Road will be prepared for human safety. The alignment and elevation of the road will not be changed.	Historic structures
<b>Future Projects</b>		
Relocation of the USS <i>West Virginia</i> and USS <i>Tennessee</i> historical marker	This is proposed. New location will be determined through cultural landscape treatment guidance in the future.	Cultural landscape characteristics

## Mitigation

Mitigation measures are identified in the impact assessment in Environmental Consequences. These measures have been developed to lessen the potential adverse effects of the alternatives.

## Environmental Consequences

### Natural Resources

This section identifies potential direct and indirect impacts to natural resources (vegetation and wild life) that may result from implementing the proposed project.

#### Vegetation

Tropical vegetation is located throughout the project area. Plants located within the project area contain both non-native and native species that are not rare to the area.

The National Park Service contracted with Steve Nimz and Associates, arborist services, to prepare a condition assessment of the trees in the Belleau Woods Neighborhood (Nimz 2011). This report addresses the condition of the trees and makes recommendations for managing the trees to protect human safety and reduce the risk to the CPO Bungalow integrity.

#### Alternative A -- No Action

*Direct and Indirect Effects* – Under the No Action alternative vegetation would be minimally managed for human safety by removal of unsafe tree limbs and roots. Some vegetation removal and pruning may be necessary to keep the vegetation from doing further damage to the structures. This would result in a minor adverse localized long-term effect.

*Mitigation measures* – None

#### Alternatives B and C -- Rehabilitation of CPO Bungalows with Visitor Focus and Preservation of CPO Bungalows with Combined Visitor and Administrative Focus

*Direct Effects* – Under Alternatives B and C the vegetation in the project area would be managed (removed and/or pruned) to preserve the historic structures and landscape. Vegetation may also be removed for human safety. There may be new vegetation added to the project area to restore the historic character of the site. Planned vegetation management will generate healthier plants. This would result in a beneficial long-term effect.

*Indirect Effects* – The long term management of the vegetation in the project area would result in healthier vegetation resulting in a beneficial long-term effect.

*Mitigation measures* – Native plants would be used if appropriate for the historic landscape.

*Cumulative Effects (Alternatives A, B and C)* – Negligible.

*Conclusion (Alternatives A, B and C)* -- The No Action alternative would result in minor adverse impacts because of lack of maintenance and care. The action alternatives will provide for a beneficial effect to the vegetation because more care and attention will go into managing it.

## Wildlife

Wildlife commonly found in the project area includes various birds, and small mammals. The animals in the area are not listed as endangered or rare to the area.

Alternative A -- No Action

*Direct and Indirect Effects* – Feral animals continue to increase in numbers, a minor, adverse, localized, long-term effect.

*Mitigation measures* – None

Alternatives B and C -- Rehabilitation of CPO Bungalows with Visitor Focus and Preservation of CPO Bungalows with Combined Visitor and Administrative Focus

*Direct and Indirect Effects* – Improved management within the project area would reduce the number of feral animals. Native species could be potentially impacted through a greater human presence. Minor adverse localized long-term effect.

*Mitigation measures* – A “no feeding” policy would be put in place to minimize the feral animals. Other measures such as trapping and removal of feral animals would be considered.

*Cumulative Effects (Alternatives A, B and C)* -- Negligible

*Conclusion (Alternatives A, B and C)* – The No Action alternative would result in little to no management of feral animals potentially perpetuating their presence in the project area creating minor adverse long-term impacts to existing resources. The action alternatives would reduce and manage the feral animals through the on-going maintenance and presence of staff. However, native species could be impacted negatively by a great presence of people and activity at the site. Therefore, there would be a minor adverse long-term effect from all of the alternatives.

## Cultural Resources

The National Park Service has consulted under Section 106 of the NHPA with the Hawaii State Historic Preservation Division (SHPD), the Advisory Council on Historic Preservation (ACHP), and interested consulting parties on the proposed project (Appendix C). While the project goal is the rehabilitation, restoration and preservation of the CPO Bungalows in accordance with the Secretary of the Interior Standards, there is the potential for an adverse effect to historic properties as defined in NHPA Section 106 given the level deterioration and treatment needed to preserve some of the buildings. To avoid or minimize adverse effects to the historic properties the NPS, SHPD, ACHP, and Historic Hawaii Foundation have developed a Programmatic Agreement (36 CFR Section 800.14) outlining guidelines for rehabilitation, preservation and restoration and to provide a process for continued Section 106 consultation throughout the project. This project would follow the Secretary of the Interior's Standards for Historic Preservation.

The Standards are neither technical nor prescriptive, but are intended to promote responsible preservation practices that help protect our Nation's irreplaceable cultural resources. For example, they cannot, in and of themselves, be used to make essential decisions about which features of the historic building should be saved and which can be changed. But once a treatment is selected, the Standards provide philosophical consistency to the work.

The four treatment approaches are Preservation, Rehabilitation, Restoration, and Reconstruction, outlined below in hierarchical order and explained:

The first treatment, **Preservation**, places a high premium on the retention of all historic fabric through conservation, maintenance and repair. It reflects a building's continuum over time, through successive occupancies, and the respectful changes and alterations that are made.

**Rehabilitation**, the second treatment, emphasizes the retention and repair of historic materials, but more latitude is provided for replacement because it is assumed the property is more deteriorated prior to work. Both Preservation and Rehabilitation standards focus attention on the preservation of those materials, features, finishes, spaces, and spatial relationships that, together, give a property its historic character.

**Restoration**, the third treatment, focuses on the retention of materials from the most significant time in a property's history, while permitting the removal of materials from other periods.

**Reconstruction**, the fourth treatment, establishes limited opportunities to re-create a non-surviving site, landscape, building, structure, or object in all new materials.



## National Historic Landmark

National Historic Landmarks are nationally significant historic places designated by the Secretary of the Interior because they possess exceptional value or quality in illustrating or interpreting the heritage of the United States.

### Alternative A -- No Action

*Direct Effects* – The CPO Bungalow neighborhood is a contributing site to the Pearl Harbor National Historic Landmark. Deterioration and lack of preservation on the bungalows and the landscape would diminish the integrity of contributing resources and character defining patterns and relationships associated with the CPO bungalow site and the greater Pearl Harbor landmark. This action could result in a major adverse wide spread long-term effect.

*Indirect Effects* – The continued deterioration of the CPO bungalows and landscape would diminish the integrity of the Pearl Harbor National Historic Landmark and could jeopardize the status of the entire landmark. This action could result in a major adverse wide spread long-term effect.

*Mitigation measures* – None

### Alternatives B and C -- Rehabilitation of CPO Bungalows with Visitor Focus and Preservation of CPO Bungalows with Combined Visitor and Administrative Focus

*Direct and Indirect Effects* – Under these alternatives, the exteriors (and some interiors) of the bungalows and landscape would be rehabilitated or restored to the WWII era period of historic significance resulting in the greater preservation of the Pearl Harbor National Historic Landmark. The intent of these alternatives is to have a beneficial effect on the National Historic Landmark. However, because the details of the rehabilitation and restoration efforts have not been defined, a Programmatic Agreement under Section 106 has been developed to outline a process for avoiding or minimizing any adverse effects.

*Mitigation measures* – The Secretary of the Interior's Standards for Historic Preservation and other measures outlined in the Section 106 Programmatic Agreement would be followed for all preservation, rehabilitation and restoration efforts.

*Cumulative Effects (Alternatives A, B and C)* – Cumulative effects for Alternative A would be major adverse due to the continued neglect and deterioration of the contributing resources (CPO Bungalows). Cumulative effect for Alternatives B and C would be beneficial.

*Conclusion (Alternatives A, B and C)* -- Continued neglect and lack of preservation of the buildings would result in a major adverse long-term effect to the NHL. The action alternatives would likely provide beneficial effects by preventing further deterioration of integrity and historic fabric of the buildings and site. Mitigation measures for the action alternatives are being implemented to avoid or minimize adverse impacts to the NHL.

## Pre-contact and Historic Archeological Resources

Currently there are no known existing archeological sites in the vicinity of the project area. A review of site potential (Erkelens, 1998) suggests that sugarcane cultivation and military construction destroyed any sites that might have existed, except for what might be in buried limestone sinkholes or caves.

### *Alternative A -- No Action*

*Direct and Indirect Effects* – The no action alternative would result in minimal to no ground disturbance within the project area. The effect of this action is negligible.

### *Mitigation measures – None*

Alternatives B and C -- Rehabilitation of CPO Bungalows with Visitor Focus and Preservation of CPO Bungalows with Combined Visitor and Administrative Focus

*Direct and Indirect Effects* – The rehabilitation and/or restoration of the CPO bungalows would bring greater attention to preservation and research potential to the project area. Because research shows that the potential for the presence of archeological materials in the project area is minimal it is assumed that no archeological resources will be impacted by these alternatives. Therefore, there would be a negligible impact.

*Mitigation measures* – Because there is always the potential for archeological resources to be discovered in the project area, continued efforts towards research will be employed. Any significant ground disturbing activities will be monitored by a qualified archeologist to ensure that no archeological resources will be impacted.

### *Cumulative Effects (Alternatives A, B and C) – Negligible*

*Conclusion (Alternatives A, B and C)* – Given the information that it is unlikely that there are any remaining intact archeological resources within the project area all alternatives would have negligible impacts to archeological resources.

## Cultural Landscapes

Cultural landscapes are complex resources that range from large rural tracts covering several thousand acres to formal gardens of less than an acre. Natural features such as landforms, soils, and vegetation are not only part of the cultural landscape, they provide the framework within which it evolves. In the broadest sense, a cultural landscape is a reflection of human adaptation and use of natural resources and is often expressed in the way land is organized and divided, patterns of settlement, land use, systems of circulation, and the types of structures that are built. The character of a cultural landscape is defined both by physical materials, such as roads, buildings, walls, and vegetation, and by use reflecting cultural values and traditions.

The Belleau Wood Neighborhood is part of the larger Ford Island cultural landscape. The Belleau Wood Neighborhood cultural landscape does not currently have a landscape treatment plan. The National Park Service plans to complete a cultural landscape treatment plan as part of this preservation effort.

#### Alternative A -- No Action

*Direct and Indirect Effects* – The No Action alternative would result in continued deterioration of the cultural landscape and associated features. This would result in a major adverse long-term effect.

*Mitigation measures* – None

#### Alternatives B and C -- Rehabilitation of CPO Bungalows with Visitor Focus and Preservation of CPO Bungalows with Combined Visitor and Administrative Focus

*Direct and Indirect Effects* – The restoration and preservation of the Belleau Woods neighborhood cultural landscape for both visitor and administrative use would provide the highest level of preservation needed to maintain the integrity of the landscape. The Secretary of the Interior's Standards for Historic Preservation along with guidance provided in the planned cultural landscape treatment plan would be followed to guide the restoration and rehabilitation efforts. These alternatives would result in a long-term beneficial effect.

*Mitigation measures* – The Secretary of the Interior's Standards for Historic Preservation, the development of a cultural landscape treatment plan and other guidance outlined in the Section 106 Programmatic Agreement would be followed for all preservation efforts.

*Cumulative Effects (Alternatives A, B and C)* – Cumulative effects for Alternative A would be major adverse due to the continued neglect and deterioration of the cultural landscape. Cumulative effect for Alternatives B and C would be beneficial to the preservation of the cultural landscape.

*Conclusion (Alternatives A, B and C)* -- There have been many changes to the cultural landscape over time through alteration and movement of the bungalows and associated features. The continued neglect in the No Action alternative would be major adverse long-term effect. The action alternatives would preserve the buildings and their historic integrity resulting in a beneficial effect.

### Historic Buildings and Structures

Historic buildings and structures in the project area include the six CPO bungalows, the Belleau Woods Loop Road, the USS *West Virginia* and USS *Tennessee* historical marker and bollards.

#### Alternative A -- No Action

*Direct and Indirect Effects* – The No Action alternative would result in continued deterioration of these buildings and structures likely resulting in the complete loss of the buildings. This would result in a major adverse long-term effect.

*Mitigation measures* – None

Alternatives B and C -- Rehabilitation of CPO Bungalows with Visitor Focus and Preservation of CPO Bungalows with Combined Visitor and Administrative Focus

*Direct and Indirect Effects* – The restoration and rehabilitation of these buildings for both visitor and administrative use would provide the high level of preservation needed to maintain the historic integrity of the buildings. The Secretary of Interior's Standards for the Treatment of Historic Properties along with stipulations outlined in the Section 106 Programmatic Agreement will be followed to guide the restoration and rehabilitation efforts. These alternatives would result in a long-term beneficial effect.

*Mitigation measures* – The Secretary of the Interior's Standards for the Treatment of Historic Properties and other measures outlined in the Section 106 Programmatic Agreement would be followed for all preservation, rehabilitation and restoration efforts.

*Cumulative Effects (Alternatives A, B and C)* – Cumulative effects for Alternative A would be major adverse due to the continued neglect and deterioration of the buildings. Cumulative effect for Alternatives B and C would be beneficial.

*Conclusion (Alternatives A, B and C)* -- Since the buildings were constructed various forms and levels of alterations, movement, etc. have taken place. The continued neglect in the No Action alternative would be major adverse long-term effect.

The action alternatives (B and C) would preserve the buildings and their historic integrity resulting in a beneficial effect.

## Scenic Resources

Scenic values are associated with both views looking out from the CPO bungalows, as well as views looking towards the CPO bungalows. Scenic resources can include both natural and cultural resources and this project contains both. However, the Pearl Harbor and Ford Island area is dominated by cultural icons.

Alternative A -- No Action

*Direct Effects* – Continued deterioration of the CPO bungalows and unmanaged vegetation would result in the scene looking towards the bungalows to become less desirable causing the

overall scenic values of Pearl Harbor and Ford Island to suffer. This would result in a major adverse long-term effect.

*Indirect Effects* – The continued deterioration of the CPO bungalows and unmanaged landscape would detract from the orderly military scene that is planned for Ford Island. This would result in a major adverse long-term effect.

*Mitigation measures* – None

Alternatives B and C -- Rehabilitation of CPO Bungalows with Visitor Focus and Preservation of CPO Bungalows with Combined Visitor and Administrative Focus

*Direct and Indirect Effects* – Under Alternative B the bungalows and landscape would be rehabilitated or restored to represent the period of significance resulting in the preservation of the scenic values of the view of the Belleau Woods neighborhood. This effort would improve the overall appearance and scenic values associated with Ford Island and Pearl Harbor. These alternatives would result in a long-term beneficial effect.

*Mitigation measures* – The Secretary of the Interior's Standards for Historic Preservation and other measures outlined in the Section 106 Programmatic Agreement would be followed for all preservation, rehabilitation and restoration efforts.

*Cumulative Effects (Alternatives A, B and C)* – Continued changes to Pearl Harbor and Ford Island have resulted in changes to the historic scene and the scenic values. The No Action alternative would contribute to the deterioration of the scene while the action alternatives would provide beneficial effects to the scenic values.

*Conclusion (Alternatives A, B and C)* – The No Action alternative would result in a major adverse long-term effect because of the continued degradation of the historic scene in Pearl Harbor and on Ford Island. The action alternatives, B and C, would help to restore and maintain the historic scene providing beneficial effects to the overall scenic value of the project area, Ford Island and Pearl Harbor.

## Park Operations

### Visitor Experience

Currently there is no regular visitor access to the CPO bungalows. Visitors are not encouraged to visit the Belleau Woods neighborhood because of safety and security concerns.

Alternative A -- No Action

*Direct and Indirect Effects* – The No Action alternative would result in the continued practice of no visitor access to the buildings or grounds. This action does not follow NPS guidance to foster

opportunities for the public to learn from and interact with cultural resources. This would result in a major, adverse, long-term effect to the visitor experience.

*Mitigation measures* – None

#### Alternative B. Rehabilitation of CPO Bungalows with Visitor Focus

*Direct Effects* – The combination of this alternative being visitor and preservation focused provides that the buildings will be preserved in a manner that allows visitors to access the site and learn from the resources. The results of this alternative would be beneficial.

*Indirect Effects* – This alternative offers the opportunity for these cultural resources to be part of the larger WWII story in Pearl Harbor for visitors to experience and appreciate. This is a beneficial effect.

*Mitigation measures* – None

#### Alternative C. Rehabilitation of CPO Bungalows with Combined Visitor and Administrative Focus

*Direct Effects* – Because alternative C focuses on Administrative use of the buildings with a visitor education component, the visitor will have the opportunity to interact and learn about these resources. The results of this alternative would be beneficial.

*Indirect Effects* – This alternative offers the opportunity for these cultural resources to be part of the larger WWII story in Pearl Harbor for visitors to experience and appreciate. This is a beneficial effect.

*Mitigation measures* – None

*Cumulative Effects (Alternatives A, B and C)* – Negligible

*Conclusion (Alternatives A, B and C)* – Under the No Action alternative visitors would not have the opportunity to interact with the resources in the project area resulting in an adverse effect to their experience. The action alternatives provide visitors the experience to learn about and interact with the resources providing a beneficial effect.

## Maintenance

Current maintenance has been emergency stabilization and minimal routine grounds maintenance.

#### Alternative A -- No Action

*Direct Effects* – Under the No Action alternative the NPS maintenance staff would have little responsibility in the project area. Likely, minimal routine ground maintenance would take place. This would result in negligible impacts to the NPS maintenance staff.

*Indirect Effects – Negligible*  
*Mitigation measures – None*

Alternatives B and C -- Rehabilitation of CPO Bungalows with Visitor Focus and Preservation of CPO Bungalows with Combined Visitor and Administrative Focus

*Direct and Indirect Effects –* Alternatives B and C would require additional maintenance needs to provide the continued upkeep of the grounds and buildings. Proper preservation planning efforts would outline the direction for maintenance needs and requirements. These alternatives would result in a minor adverse long-term impact on park staff.

*Mitigation measures – None*

*Cumulative Effects (Alternatives A, B and C) – Negligible*

*Conclusion (Alternatives A, B and C) –* No action does not change the level of current maintenance that the NPS staff provides in the project area. The action alternatives create more maintenance needs, but these needs will come with a preservation plan that should make impacts to the maintenance division minor.

### **Safety/Security**

The CPO bungalows are locked and secured. Access to Ford Island is restricted.

Alternative A -- No Action

*Direct and Indirect Effects –* The No Action alternative would result in the continued practice of no visitor access to the buildings or grounds. With minimal staff and visitor presence at the buildings this opens up more opportunities for vandalism and injury. This would result in a moderate adverse long-term impact.

*Mitigation measures – None*

Alternatives B and C -- Rehabilitation of CPO Bungalows with Visitor Focus and Preservation of CPO Bungalows with Combined Visitor and Administrative Focus

*Direct and Indirect Effects –* With higher staff and visitor presence at the site security concerns will be reduced. On-going maintenance of the buildings and grounds will provide a safer setting. This results in a beneficial effect for safety and security concerns.

*Mitigation measures – None*

*Cumulative Effects (Alternatives A, B and C) – Negligible*

*Conclusion (Alternatives A, B and C) – Safety and security will continue to be a major adverse effect if the No Action alternative is chosen because the buildings and grounds will be unoccupied inviting potential vandalism and injury. The action alternatives would be beneficial in that the buildings will be occupied and maintained.*

Table 5 is a summary and comparison of Environmental Consequences for each impact topic and alternative.

**Table 5. Environmental Consequences Comparison Table**

Impact Topic		Direct, Indirect, Cumulative Impacts	Alternative A – No Action	Alternative B - Rehabilitate CPO Bungalows with Visitor Focus	Alternative C - Rehabilitate CPO Bungalows with Combined Visitor and Administrative Focus
Natural Resources	Vegetation	Direct impacts	Minor adverse	Beneficial	Beneficial
		Indirect impacts	Minor adverse	Beneficial	Beneficial
		Cumulative impacts	Negligible	Negligible	Negligible
	Wildlife	Direct impacts	Minor adverse	Minor adverse	Minor adverse
		Indirect impacts	Minor adverse	Minor adverse	Minor adverse
		Cumulative impacts	Negligible	Negligible	Negligible
Cultural Resources	National Historic Landmark	Direct impacts	Major adverse	Beneficial**	Beneficial**
		Indirect impacts	Major adverse	Beneficial**	Beneficial**
		Cumulative impacts	Negligible	Negligible	Negligible
	Pre-contact and Historic Archeology	Direct impacts	Negligible	Negligible	Negligible
		Indirect impacts	Negligible	Negligible	Negligible
		Cumulative impacts	Negligible	Negligible	Negligible
	Cultural Landscape	Direct impacts	Major adverse	Beneficial**	Beneficial**
		Indirect impacts	Major adverse	Beneficial**	Beneficial**
		Cumulative impacts	Negligible	Negligible	Negligible
	Historic Buildings and Structures	Direct impacts	Major adverse	Beneficial**	Beneficial**
		Indirect impacts	Major adverse	Beneficial**	Beneficial**
		Cumulative impacts	Negligible	Negligible	Negligible
	Scenic Resources	Direct impacts	Major adverse	Beneficial	Beneficial
		Indirect impacts	Major adverse	Beneficial	Beneficial
		Cumulative	Minor adverse	Beneficial	Beneficial



		impacts			
Park Operations	Visitor Experience	Direct impacts	Major adverse	Beneficial	Beneficial
		Indirect impacts	Major adverse	Beneficial	Beneficial
		Cumulative impacts	Negligible	Negligible	Negligible
	Maintenance	Direct impacts	Negligible	Minor adverse	Minor adverse
		Indirect impacts	Negligible	Minor adverse	Minor adverse
		Cumulative impacts	Negligible	Negligible	Negligible
	Safety/Security	Direct impacts	Moderate adverse	Beneficial	Beneficial
		Indirect impacts	Moderate adverse	Beneficial	Beneficial
		Cumulative impacts	Negligible	Negligible	Negligible

\*\* It is anticipated that all rehabilitation actions will have beneficial results on the cultural resources in the project. However, some actions to stabilize and rehabilitate the buildings could result in removal or replacement of historic fabric or other similar actions. A Programmatic Agreement under NHPA Section 106 (Appendix D) has been prepared that outlines the stipulations for treatment that will avoid, minimize or mitigate potential adverse effects to the cultural resources.

# Public Involvement

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WWII Valor in the Pacific National Monument conducted internal scoping in February and March 2011. Included in the internal scoping were members of WWII Valor in the Pacific National Monument and the Pacific West Regional NPS office. A variety of comments were received from park staff in cultural resources, interpretation and education and maintenance.

During the public scoping process for this Environmental Assessment, which occurred from April 13, 2011 through May 15, 2011 (see Appendix A for media release), comments were received and recorded. Comments from the public focused on –

- Ensuring that the CPO bungalow neighborhood retains historic integrity
- Utilizing the buildings for a variety of purposes consistent with preservation
- Making the buildings ADA accessible
- Managing the on-site vegetation to avoid further damage to the buildings
- Providing visitor services (interpretation and education) on-site
- Integrating the Oklahoma Memorial into the site
- Working with the Navy Lodge to provide exclusive lodging options for guests

There were very few written comments received during public scoping. The majority of the comments were shared during both the public meeting and site visits.

This Environmental Assessment is being made available to the public, federal, state and local agencies and organizations through media releases distributed to a wide variety of news media, direct mailing, placement on the park's website ([www.nps.gov/valr](http://www.nps.gov/valr)), on the NPS PEPC website at (<http://parkplanning.nps.gov/>). This EA is distributed to –

Historic Hawaii Foundation  
National Chief Petty Officers Association  
Joint Base Pearl Harbor-Hickam  
USS Oklahoma Memorial Committee  
Hawaii State Elected Officials  
AmVets National Service Organization  
Pacific Aviation Museum, Pearl Harbor  
Battleship Missouri Memorial  
USS Bowfin Submarine Park and Museum  
National Trust for Historic Preservation  
National Parks Conservation Association

Copies of the document may also be obtained by calling Servillina Downer at WWII Valor in the Pacific National Monument at (808) 423-7300 extension 7627.

Responses to comments on the Environmental Assessment will be addressed in the proposed Finding of No Significant Impact (FONSI) or will be used to prepare an Environmental Impact Statement (if appropriate).

# List of Preparers

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## **National Park Service Personnel**

Cari Kreshak, Pacific West Region, Honolulu, Cultural Resource Program Manager

Paul DePrey, WWII Valor in the Pacific National Monument, Superintendent

Lorin Diaz, WWII Valor in the Pacific National Monument, Park Guide

Peter Super, WWII Valor in the Pacific National Monument, Park Guide

# CONSULTATION AND COORDINATION

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The National Park Service has followed a public process to identify the issues and concerns related to the development of a management plan for the CPO Bungalows. From the initial scoping sessions with members of the public and other agencies, a series of alternatives were developed, analyzed and presented to the public. Public comments and responses have provided further refinement of the decision to be made. The following is a list of meetings that were held to develop this Environmental Assessment.

Internal scoping -- February 24, 2011

Public Open House -- April 13, 2011

Public Site Tour -- April 16, 2011

Section 106 Consultation -- June 21, 2011

Section 106 Consultation with ACHP -- July 22, 2011

## Endangered Species Act Summary

The NPS sent a letter to the US Fish and Wildlife Service on June 9, 2011, consulting on any species or habitat of concern in the project area. A reply was received from the US Fish and Wildlife on August 23, 2011, indicating, "To the best of our knowledge, no federally listed species or critical habitat units occur within the proposed project footprint". These two letters can be found in Appendix B.

## NHPA Section 106 Summary

As part of the CPO Bungalow management planning process, compliance with Section 106 of the National Historic Preservation Act (NHPA) (Section 106) is required. Beginning in March 2011, a letter was sent to potential consulting parties including the Hawaii SHPO and the Advisory Council on Historic Preservation announcing that the NPS was initiating the NEPA and NHPA compliance processes for the project.

April 13 – May 15, 2011, was the National Environmental Policy Act public scoping period for the project. Section 106 consultation was conducted with the NEPA Public meetings and comments were accepted and recorded.

On June 21, 2011, a NHPA Section 106 consultation meeting was held with interested parties. Discussions at this meeting, along with guidance from the Advisory Council on Historic Preservation, resulted in the determination that there would be a potential for adverse effects to historic properties given the level of restoration that may be needed, so a Programmatic Agreement outlining ways to avoid and/or minimize impacts was prepared (Appendix D). The

PA also outlines the process for continued Section 106 consultation given that the project will be completed in phases.

Section 106 consultations will be ongoing with the distribution of this document to the public until a NEPA Finding of No Significant Impact (FONSI) or Record of Decision (ROD) has been established.

As the CPO Bungalows are contributors to the U.S. Naval Base, Pearl Harbor National Historic Landmark, Section 110 of the Historic Preservation Act also applies. Section 110(f) states: Prior to the approval of any Federal undertaking which may directly and adversely affect any National Historic Landmark, the head of the responsible Federal agency shall, to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to such landmark, and shall afford the Advisory Council on Historic Preservation a reasonable opportunity to comment on the undertaking.

National Historic Landmark designation places a higher standard on undertakings than is applied to properties that are listed in or eligible for listing in the National Register of Historic Places only.

The Advisory Council on Historic Preservation, the Hawai'i state historic preservation officer, and concerned groups were contacted at the beginning of this environmental assessment process (see Consultation and Coordination). The NPS conducted the Section 106 and is forwarding a copy of this environmental assessment to the State Historic Preservation Officer and the Advisory Council for Historic Preservation.

# REFERENCES

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# APPENDICES

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## APPENDIX A -- Public Meeting Media Release

### **World War II Valor in the Pacific National Monument Proposes Preservation and Management Plan for Historic Chief Petty Officer Bungalows on Ford Island**

The National Park Service is planning to prepare a preservation and management plan for six historic Chief Petty Officer (CPO) bungalows on Ford Island in Pearl Harbor. The National Park Service acquired the CPO bungalows with the establishment of the WWII Valor in the Pacific National Monument in 2008.

The original CPO bungalows were constructed in the 1920's as part of an effort by Ford Island Naval Air Station to construct residences and quarters on the northwest shore and northeast tip of Ford Island. With the movement of the Pacific Fleet to Pearl Harbor in May 1940, Ford Island's northeast tip became moorage for most of the fleet's largest ships along Battleship Row. On December 7, 1941, when Japanese aircraft attacked Pearl Harbor, Navy battleships, including the USS *Arizona*, were anchored just offshore (less than 100 yards) from the bungalows. The neighborhood was part of the battlefield and some bungalows sustained minor damage during the attack from smoke and fire.

Very little World War II era housing remains on Ford Island. The bungalows have been determined to be significant because of their association with the beginnings of naval aviation in Hawaii and with the attack on Pearl Harbor. In 1964, the bungalows were included as a component of the newly designated Pearl Harbor National Historic Landmark. Architecturally the bungalows are significant as a group of vernacular houses that reflect Hawaii's architectural solutions for low-cost housing.

The National Park Service is developing a management plan that will promote the preservation of the CPO bungalows. In addition to preserving the historic CPO bungalows, there is a need for education and interpretation at the site to further tell the story of the Pacific War, Ford Island and military life. With the establishment of the WWII Valor in the Pacific National Monument, the National Park Service also has additional administrative needs (office, storage, housing, etc.). This project seeks to integrate the preservation, education and interpretation and administrative needs into a viable management action.

WWII Valor in the Pacific National Monument Superintendent, Paul DePrey, states, "I am excited about the opportunity to preserve and restore the CPO bungalows and encourage anyone interested to participate in the upcoming informational open house."

An Environmental Assessment for this project, in compliance with the National Environmental Policy Act (NEPA) and Section 106 consultation under the National Historic Preservation Act (NHPA) are being conducted to provide the decision-making framework that analyzes a reasonable range of alternatives to meet project objectives and evaluate potential issues and impacts to the National Monument's resources and values.

We are currently in the public scoping phase of this project and invite interested parties to attend an informational open-house on Wednesday, April 13, 2011, 2pm – 7pm at the Pearl Harbor Visitor Center. A site tour of the CPO bungalows will be held on Saturday, April 16, 2011. More information about the project can be found on the WWII Valor in the Pacific National Monument website ([nps.gov/valr](http://nps.gov/valr)) or the

National Park Service website *Planning, Environment, and Public Comment*  
(<http://parkplanning.nps.gov/valr>).

-NPS-

## APPENDIX B – US Fish and Wildlife Service Section 7 Consultation



### United States Department of the Interior

NATIONAL PARK SERVICE  
WWII Valor in the Pacific National Monument  
1 Arizona Memorial Place  
Honolulu, Hawaii 96818



IN REPLY REFER TO  
H30(VALR)

June 9, 2011

Mr. Loyal Mehrhoff  
U.S. Fish and Wildlife Service  
Pacific Islands Fish and Wildlife Office  
300 Ala Moana Boulevard  
Room 3-122, Box 50088  
Honolulu, HI 96850

Dear Mr. Mehrhoff,

The National Park Service (NPS) is initiating an Environmental Assessment (EA) under the National Environmental Policy Act for a project called *Preservation of Chief Petty Officer Bungalows on Ford Island*. This project proposes to rehabilitate and restore six historic Chief Petty Officer bungalows that are located on Ford Island, Pearl Harbor, Oahu within the World War II Valor in the Pacific National Monument. Please see the enclosed map for locations of the six bungalows. The bungalows are identified by their building numbers – 32, 31, 29, 28, 90 and 68.

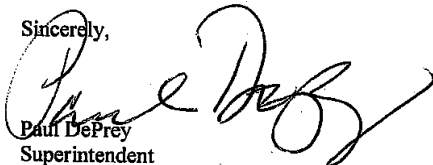
The six Chief Petty Officer bungalows were constructed by the Navy between the years of 1923 and 1939. The homes are unique examples of historical Navy housing in Hawaii. The neighborhood is directly associated with the December 7 attack and its aftermath due to its location within Pearl Harbor and proximity to Battleship Row. The homes had continuous residential use until the 1990s when they were vacated and mothballed. The six bungalows were transferred from the Navy to the National Park Service when the WWII Valor in the Pacific National Monument was established in 2008.

The EA will identify potential alternative actions for the future preservation and management of the six Chief Petty Officer bungalows. The timeline for the NEPA process will include a 30-day public comment period, likely to be in late 2011. To initiate our compliance with the Endangered Species Act for this proposed Federal action, we are requesting a list of species and designated critical habitat protected under the Endangered Species Act which we should consider in our environmental analyses for this project. The list of species you provide will be addressed during this NEPA process.

If you would like further information about the project, please visit the project website at [www.parkplanning.nps.gov/valr](http://www.parkplanning.nps.gov/valr).

Thank you for your attention to this request. If you have any questions, please contact compliance specialist, Cari Kreshak, at (808)541-2693 ext. 734 or [cari\\_kreshak@nps.gov](mailto:cari_kreshak@nps.gov).

Sincerely,

  
Paul DePrey  
Superintendent

Enclosure: CPO Bungalow Project Area Map  
CC: Cari Kreshak, NPS PWR



Aaron\_Nadig@fws.gov

08/23/2011 01:52 PM

To Paul\_DePrey@nps.gov

cc

Subj 2011-TA-0389 NEPA project for Preservation of Chief Officer  
ect Bungalows on Ford Island

Mr. DePrey,

Your letter requesting a list of threatened and endangered species and designated critical habitat related to the proposed project area located on Ford Island, Oahu was received by our office via electronic mail on August 16, 2011. We have reviewed the information you provided and pertinent information in our files, including data compiled by the Hawaii Biodiversity and Mapping Program as it pertains to listed species and designated critical habitat. Land cover information indicates that the proposed project locations are classified as high intensity development. To the best of our knowledge, no federally listed species or critical habitat units occur within the proposed project footprint.

We appreciate your efforts to conserve endangered species. If you have questions, please feel free to contact me.

Thank you,  
Aaron Nadig

~~~~~  
Aaron Nadig  
Fish and Wildlife Biologist  
Consultation and Habitat Conservation Program  
Pacific Islands Fish and Wildlife Office  
300 Ala Moana Boulevard, Room 3-122, Box 50088  
Honolulu, Hawaii 96850

Phone:(808) 792-9466  
Fax:(808) 792-9581  
~~~~~

## **APPENDIX C – National Historic Preservation Act, Section 106 Consultation**

### **Letter from Advisory Council on Historic Preservation**

Milford Wayne Donaldson  
Chairman

John M. Fowler  
Executive Director



*Preserving America's Heritage*

April 12, 2011

The Honorable John B. Jarvis  
Director  
National Park Service  
1849 C Street, NW  
Washington, DC 20240

**REF:** *Proposed Preservation and Management Plan for Chief Petty Officer Bungalows  
at WWII Valor in the Pacific National Monument, Hawaii*

Dear Mr. Jarvis:

In response to a notification by the National Park Service, the Advisory Council on Historic Preservation (ACHP) will participate in consultation to develop a programmatic agreement for the proposed phased preservation and reuse of the Chief Petty Officer (CPO) bungalows at the WWII Valor in the Pacific National Monument in Honolulu, Hawaii. Our decision to participate in this consultation is based on the *Criteria for Council Involvement in Reviewing Individual Section 106 Cases*, contained within our regulations. The criteria are met for this proposed management plan because its component projects may affect the bungalows, which are contributing resources to the Pearl Harbor National Historic Landmark. In addition, the NPS proposes to use the National Environmental Policy Act (NEPA) process for Section 106 purposes in accordance with Section 800.8(c) of our regulations while also developing a programmatic agreement for the plan to be implemented in phases over a lengthy period of time (10 years or more). ACHP participation will help NPS to identify and consult with interested parties to develop the tailored Section 106 process that will be interpreted and implemented in the years to come.

Section 800.6(a)(1)(iii) of our regulations requires that we notify you, as the head of the agency, of our decision to participate in consultation. By copy of this letter, we are also notifying Paul DePrey, Superintendent of the National Monument, of this decision.

Our participation in this consultation will be handled by Katry Harris who can be reached by telephone at (202) 606-8520, or by e-mail at [kharris@achp.gov](mailto:kharris@achp.gov). We look forward to working with your agency and other consulting parties to tailor the Section 106 process for this program that will provide the framework for NPS to avoid, minimize, or mitigate potential adverse effects on historic properties and to reach a programmatic agreement.

Sincerely,

  
John M. Fowler  
Executive Director

ADVISORY COUNCIL ON HISTORIC PRESERVATION

1100 Pennsylvania Avenue NW, Suite 803 • Washington, DC 20004  
Phone: 202-606-8503 • Fax: 202-606-8647 • [achp@achp.gov](mailto:achp@achp.gov) • [www.achp.gov](http://www.achp.gov)

## Invitation to Section 106 Consultation Meeting

-----Original Message-----

From: Paul\_DePrey@nps.gov [mailto:Paul\_DePrey@nps.gov]  
Sent: Friday, May 27, 2011 3:13 PM  
To: kiersten@historichawaii.org; Richard Kitchens;  
repjohansen@capitol.hawaii.gov; Lisa Vargas; repaquino@capitol.hawaii.gov;  
repcabanilla@capitol.hawaii.gov; reppine@capitol.hawaii.gov;  
senige@capitol.hawaii.gov; sennishihara@capitol.hawaii.gov;  
senespero@capitol.hawaii.gov; wro@nthp.org; contact@theadmiralspeaks.org;  
jerrylsweeney@gmail.com; jking@amvets.org; glen@masonarch.com;  
ken.dehoff@pacificaviationmuseum.org; jerryhofwolt@hawaii.rr.com;  
mikec@ussmisouri.org; brian\_turner@nthp.org; ellyngoldkind@navy.mil  
Cc: Cari\_Kreshak@nps.gov; Patricia\_A\_Brown@nps.gov; David\_Stransky@nps.gov;  
Scott\_Pawlowski@nps.gov; Daniel\_Martinez@nps.gov; Eileen\_Martinez@nps.gov;  
Merry\_Petrossian@nps.gov  
Subject: NHPA Section 106 Meeting for NPS CPO Bungalow Project at Pearl Harbor

Email Format -- Electronic Correspondence - No Hard Copy to Follow

Aloha,

This email provides an update on the 'Rehabilitate and Restore Chief Petty Officer Bungalows on Ford Island' project at WWII Valor in the Pacific National Monument and asks for your continued consultation under the National Historic Preservation Act, Section 106.

In April, the National Park Service (NPS) hosted a public open house meeting to discuss potential project alternatives under the National Environmental Preservation Act (NEPA). We also hosted a tour of the CPO bungalow site on Ford Island. If you were not able to attend these meetings, you can access project information on this website - [parkplanning.nps.gov/valr](http://parkplanning.nps.gov/valr) (select 'Rehabilitate and Restore' from the table at the bottom of the page). The planning team has uploaded a Power Point presentation about the project and the Historic American Building Survey (HABS) reports for each of the six bungalows.

The NPS received comments at the April meetings and throughout the month of May in response to the proposed actions for rehabilitation and preservation of the CPO bungalows. After consideration of the comments and the National Park Service's needs, four alternatives were developed for this project.

1. No-action -- This alternative would result in the bungalows being managed in their current state with limited/minimal stabilization efforts.
2. Restoration with Visitor Focus -- This alternative would restore the bungalows to exhibit historic integrity both on the exterior and interior providing opportunities for visitors to experience and learn about the human component of the Pacific War.
3. Restoration with Administrative Focus -- This alternative would restore the exterior of the bungalows to exhibit historic integrity and the primary use of the buildings would be administrative (office, residence, storage, etc.).

4. Restoration with Combined Visitor and Administrative Focus -- This alternative would restore the bungalows to some level of both exterior and interior historic integrity providing opportunities for visitors to experience and learn (internal and external exhibits) and the National Park Service administrative needs (office, residence, storage, etc.).

While the National Park Service's goal for this project is to preserve the historic integrity of the CPO bungalows, the restoration efforts and new uses for the bungalows may result in an adverse effect to historic properties as defined in 36 CFR 800.5. Because of this possibility, the National Park Service under advisement from the Advisory Council on Historic Preservation (ACHP) has chosen to develop a programmatic agreement (PA) under 36 CFR 800.14 to establish guidelines that assure adverse effects will be avoided or minimized. The NPS is inviting you to participate in the discussion and development of this PA.

Please plan to attend a meeting to develop the Programmatic Agreement preservation guidelines on June 21, 2011, at 10:00 am. The meeting will be held at the Pearl Harbor Visitor Center, 2nd floor conference table located in the Ranger Offices. Please RSVP to this invitation. As a reminder, security measures are used for access to the Pearl Harbor Visitor Center. Notify the guard staff that you are attending a meeting with me as you enter the center. Please keep purses and bags to a minimum. If you are unable to attend in person, the NPS will arrange for a call in conference call line.

I look forward to your continued participation in this process and hope to see you on June 21. If you have questions please contact me at (808)266-0826.

Paul DePrey  
Superintendent  
World War II Valor in the Pacific National Monument Pearl Harbor  
1 Arizona Memorial Place  
Honolulu, Hawai'i 96818  
808-266-0826  
808-483-8608 (fax)



## **APPENDIX D – NHPA Section 106 Programmatic Agreement**

PROGRAMMATIC AGREEMENT  
BETWEEN THE NATIONAL PARK SERVICE, WWII VALOR IN THE PACIFIC  
NATIONAL MONUMENT,  
THE HAWAII STATE DEPARTMENT OF LAND AND NATURAL RESOURCES,  
HISTORIC PRESERVATION DIVISION,  
AND THE ADVISORY COUNCIL ON HISTORIC PRESERVATION  
REGARDING  
REHABILITATION OF THE HISTORIC CHIEF PETTY OFFICE BUNGALOWS ON FORD  
ISLAND  
WWII VALOR IN THE PACIFIC NATIONAL HISTORIC MONUMENT, HONOLULU  
COUNTY, HAWAII

January 17, 2012

WHEREAS, the Chief Petty Officer (CPO) bungalows on Ford Island are managed by the National Park Service (NPS) as a part of the WWII Valor in the Pacific National Monument (the Park); and

WHEREAS, the CPO bungalows are listed on the National Register of Historic Places and contributing features to the Pearl Harbor National Historic Landmark; and

WHEREAS, the Superintendent is the responsible agency official for purposes of compliance with Section 106 of the National Historic Preservation Act as defined in 36 CFR 800.2 and is accountable to the Regional Director for full performance of Section 106 compliance through the NPS Management Policies, and procedures for performance and program evaluation; and

WHEREAS, the NPS proposes to preserve, rehabilitate and restore the six CPO bungalows on Ford Island (Undertaking) in phases for use by visitors and park administration; and

WHEREAS, a preferred alternative -- Preservation of CPO Bungalows with Combined Visitor and Administrative Focus -- for the Undertaking was identified in the Preservation of Chief Petty Officer Bungalows on Ford Island Environmental Assessment (2011) based on the analysis of environmental consequences; and

WHEREAS, the Park has determined that the Area of Potential Effect (APE) for the Undertaking, as defined in 36 CFR Part 800.16(d) of the Advisory Council on Historic Preservation regulations, is the Belleau Woods neighborhood including CPO bungalows #28, 29, 31, 32, 68 and 90. This area is within the WWII Valor in the Pacific National Monument boundary on Ford Island. A map of the APE is attached to this agreement; and

WHEREAS, the Undertaking will be implemented in phases as funding becomes available, and the first phase will stabilize the buildings to avoid further deterioration; and

WHEREAS, the NPS, through contract with Mason Architects, Inc., has an Evaluation of Historic Structures, CPO Bungalows, USS Utah Memorial, USS Arizona Memorial and Mooring Quays, WWII Valor in the Pacific National Monument (2011) to guide the preservation and rehabilitation efforts; and

WHEREAS, the NPS has determined that the Undertaking may have an effect on the character of the historic CPO bungalows; and

WHEREAS, the Park has consulted with the Hawaii State Historic Preservation Division (SHPD) pursuant to 36 CFR part 800, the regulations implementing Section 106 of the National Historic Preservation Act (NHPA) (16 U.S.C. § 470f); and

WHEREAS, the NPS has invited the ACHP to participate in this programmatic agreement pursuant to 36 CFR Part 800.6(a)(1)(C)(iii), and ACHP has agreed to participate; and

WHEREAS, the Park has notified and invited: Historic Hawaii Foundation (concurring party), National Trust for Historic Preservation, Joint Base Pearl Harbor Hickam, Pearl Harbor Historic Sites, Mason Architects and state and local elected representatives to participate in the Section 106 review of the Undertaking; and

WHEREAS, the parties listed above, in addition to the signatories, are considered consulting parties and will have opportunities to participate in continued consultation pursuant to this agreement as the Undertaking is implemented in phases; and

WHEREAS, the public was informed of the Section 106 review of this Undertaking and provided an opportunity to comment on historic preservation issues during the public comment period for the Environmental Assessment; and

WHEREAS, the purpose of this Programmatic Agreement is to ensure continued compliance with the NHPA, Section 106, whereby the NPS will carry out consultation for each phase of development and, prior to any effort that may directly or adversely affect the site, shall to the maximum extent possible, undertake planning and action as may be necessary to minimize harm and shall afford the Hawaii SHPD a reasonable opportunity to comment, respectively; and

WHEREAS, the definitions of 36 CFR 800.16 are applicable throughout this Agreement;

NOW, THEREFORE, the NPS and the Hawaii SHPD agree that the Undertaking shall be implemented in accordance with the following stipulations in order to take into account foreseen and unforeseen future effects to historic properties.

## I. STIPULATIONS

The National Park Service (NPS) will ensure that the Undertaking will be carried out in compliance with the stipulations set forth in this Programmatic Agreement, with the goal of maximum preservation:

A. The NPS shall consult with the SHPD in carrying out the terms of the Agreement. Such consultation may include but not be limited to:

- Written correspondence
- Conference calls
- Face-to -face meetings
- Field visits

B. The SHPD agrees to respond to requests for review within thirty days (30) of receipt of compliance documentation. If no response is received within thirty (30) days of receipt, NPS may assume concurrence with its findings, conclusions and/or recommendations.

C. The NPS will continue to implement stabilization efforts on the bungalows to avoid further deterioration of the structures.

D. The NPS will have a cultural landscape treatment plan prepared for the CPO bungalow neighborhood prior to implementing significant changes to the landscape.

E. All future phases of preservation and rehabilitation efforts in the Undertaking will be designed by NPS with the intent of avoiding adverse effects to the CPO bungalows and the NHL. The following treatments will be applied when feasible to avoid potential adverse effects:

1. NPS will assure that all significant features of the CPO bungalows that need to be replaced will be replaced-in-kind. Original features will be photographically documented before work is initiated.
2. Contractors will be required to preserve significant historic features as much as practicable.
3. Whenever possible, missing historic features will be reconstructed.
4. An archeologist will monitor major ground disturbing activities to ensure avoidance of any potentially significant archeological resources.

F. For each future phase of the Undertaking, NPS will apply the provisions of the Servicewide Programmatic Agreement (PA). If the phase qualifies for Streamlined Review, then NPS will document the phase in accordance with the Streamlined Review stipulations in the PA. If the phase does not qualify for Streamlined Review or may adversely affect historic properties, then the NPS will consult with the SHPD and other consulting parties in a manner consistent with 36 CFR § 800.6 to evaluate alternatives to minimize or mitigate such adverse effects. NPS shall

document the resolution of adverse effects for the phase of the Undertaking in a treatment plan by mutual agreement with the SHPD.

## II. UNANTICIPATED DISCOVERIES

A. If previously unidentified historic properties are identified during the Undertaking, then project implementation will cease in that area and the SHPD and other consulting parties notified.

B. NPS, in consultation with the SHPD, shall evaluate the historic properties to determine if they meet the National Register criteria and shall request SHPD concurrence. The SHPD has 30 days to review and respond to the request (36 CFR 800.3(C)(4)).

C. The NPS will consult with the SHPD and other consulting parties regarding its consideration of feasible measures to avoid, minimize, or mitigation adverse effects to historic properties in accordance with 36 CFR § 800.13, and, if the discovery contributes to the NHL, 36 CFR § 800.10.

a. If appropriate, archeological treatment plans will be developed in consultation with SHPD and other consulting parties. The plans will describe protection measures for affected archeological features, relevant research questions to be answered, methods for data recovery, monitoring during construction, responsibilities and coordination, and the interpretation and curation of recovered materials.

D. In the event that human remains, funerary objects, sacred objects, or objects of cultural patrimony are discovered during project implementation, work on the project will be suspended until their appropriate disposition is determined under the provisions of NAGPRA and other appropriate federal and state laws and regulations.

## III. DISPUTE RESOLUTION

A. Should either Signatory Party to this PA object at any time to the manner in which the terms of this PA are implemented, or to any documentation prepared per and subject to the terms of this PA, the parties will immediately proceed to consult for no more than thirty (30) days thereafter to resolve the objection.

B. If at the end of the 30-day consultation period, the Signatory Parties determine that the objection cannot be resolved through such consultation, the NPS will forward all documentation relevant to the objection to the Advisory Council on Historic Preservation per 36 CFR §800.2(b)(2). Any comments provided by the Council within 30 calendar days after its receipt of all relevant documentation, and all other comments received, will be taken into account by NPS in reaching a final decision regarding the objection.

C. NPS will notify the Hawaii SHPD in writing of its final decision within fifteen (15) calendar days after it is rendered. NPS shall have the authority to make the final decision resolving the objection.

D. NPS may proceed with the portions of the Project that are not the subject of the dispute.

#### IV. AMENDMENT AND TERMINIATION

A. Any Signatory to this agreement may request that it be amended, whereupon the parties will consult to reach a consensus on the proposed amendment. Where no consensus can be reached, the agreement will not be amended.

B. Any Signatory to this agreement may terminate it by providing thirty (30) days notice to the other parties, provided that the signatories and concurring parties will consult during the period prior to termination to seek agreement on amendments or other actions that would avoid termination.

C. In the event of termination, the NPS shall comply with 36 CFR Part 800, or the Servicewide Programmatic Agreement with regard to all remaining actions under this agreement.

#### V. DURATION OF THIS AGREEMENT

A. The duration of this agreement shall be ten years from the date of final execution.

B. Six months before the date on which the agreement will expire, the NPS shall notify Signatories of the impending expiration of the agreement. If the parties so choose, the agreement shall be extended for five additional years.

C. If the Signatories do not agree to extend the agreement, the NPS shall comply with 36 CFR Part 800 or the applicable Servicewide Programmatic Agreement with regard to all remaining actions under this agreement.

#### VI. ANTI-DEFICIENCY ACT

All requirements set forth in the PA requiring expenditure of NPS funds are expressly subject to the availability of appropriations and the requirements of the Anti-Deficiency Act (31 U.S.C. §1341). No obligation undertaken by NPS under the terms of this PA shall require or be interpreted to require a commitment to expend funds not appropriated for a particular purpose. If NPS cannot perform any obligation set forth in this PA because of unavailability of funds, that obligation must be renegotiated among NPS and the SHPD.

## VII. EFFECTIVE DATE

Execution of this agreement by the NPS, SHPD, and ACHP and implementation of its terms evidence that NPS has taken into account the effects of this undertaking on historic properties and afforded the ACHP an opportunity to comment.

The project area of potential effect includes the six CPO bungalows within the WWII Valor in the Pacific National Monument boundary on Ford Island.

INVITED SIGNATORY TO THIS PROGRAMMATIC AGREEMENT:

FOR THE NATIONAL PARK SERVICE:

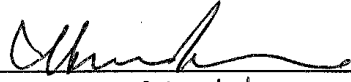
BY:  DATE: 2/22/2012

PRINTED NAME: Paul DePrey

TITLE: Superintendent

INVITED SIGNATORY TO THIS PROGRAMMATIC AGREEMENT:

FOR THE ADVISORY COUNCIL ON HISTORIC PRESERVATION:

BY:  DATE: 3/19/12

PRINTED NAME: Reid Nelson

TITLE: Director, (For Executive Director)



INVITED SIGNATORY TO THIS PROGRAMMATIC AGREEMENT:

FOR THE HAWAII DEPARTMENT OF LAND AND NATURAL RESOURCES, STATE  
HISTORIC PRESERVATION DIVISION:

BY:  DATE: 2/4/12

PRINTED NAME: William J. Aky Jr.

TITLE: Chairman DCR

CONCURRING PARTY TO THIS PROGRAMMATIC AGREEMENT:

FOR HISTORIC HAWAII FOUNDATION:

BY: Kiersten Faulkner DATE: Feb. 1, 2012

PRINTED NAME: KIERSTEN FAULKNER

TITLE: EXECUTIVE DIRECTOR