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U.S. Department of the Interior

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PACIFIC WEST REGIONAL OFFICE Memorandum

L7617 (PWRO-P)

23 MAY 2012

Memorandum

To: Superintendent, WWII Valor in the Pacific National Monument

From: Regional Director, Pacific West

Subject: Environmental Compliance for Rehabilitation of CPO Bungalows
on Ford Island

The finalized *Finding of No Significant Impact* (FONSI; received May 22) for this historic facilities rehabilitation project is approved. To complete the conservation planning-impact analysis process for this particular initiative, at the time when the park announces the decision, all recipients of the original EA should be provided the *Errata* with instructions to attach the document to the EA so as to have a full and complete record of the analysis undertaken.

Congratulations to all staff involved in completing this inaugural step forward in enhancing the new park's potential to welcome and inspire visitors for years to come!

Christine S. Lehnertz

Attachments:2

cc:

PAAR-S

PWR-NRHP

FINDING OF NO SIGNIFICANT IMPACT
REHABILITATION OF CHIEF PETTY OFFICER BUNGALOWS ON FORD ISLAND

National Park Service, U.S. Department of the Interior
WWII Valor in the Pacific National Monument
May 2012

INTRODUCTION

This Finding of No Significant Impact (FONSI) has been prepared, in accordance with the National Environmental Protection Act (NEPA), for the Rehabilitation of Chief of Petty Officer Bungalows on Ford Island, Honolulu County, Hawaii. The FONSI, along with the EA and Errata Sheet, comprise the complete record of environmental impact analysis for the project.

This document describes the Selected Alternative and provides an explanation of why it will have no significant effects on the human environment. The project will 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.

PURPOSE AND NEED FOR ACTION

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.

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.

ENVIRONMENTALLY PREFERRED ALTERNATIVE

The National Park Service (NPS) has determined that the environmentally preferred alternative for this project is Alternative 1, the Preferred Alternative. The environmentally preferred alternative is the alternative that will promote the national environmental policy expressed in NEPA (sec. 101 (b)). This includes alternatives that:

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

The Council on Environmental Quality Regulations (CEQ) regulations implementing NEPA and the NPS NEPA guidelines require that "the alternative or alternatives which were considered to be environmentally preferable" be identified (Council on Environmental Quality Regulations, Section 1505.2). Ordinarily, this means the alternative that causes the least damage to the biological and physical environment; it also means the alternative that best protects, preserves, and enhances historic, cultural, and natural resources.

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

	The Secretary of the Interior's Standards for Historic Preservation and other measures outlined in the Section 106 Programmatic Agreement will be followed for all preservation, rehabilitation and restoration efforts.	NPS Project Manager and Cultural Resources staff
	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.	NPS Project Manager and Cultural Resources staff
	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 will be followed for all preservation efforts.	NPS Project Manager and Cultural Resources staff

PUBLIC INVOLVEMENT AND AGENCY CONSULTATION

Scoping

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.

Public scoping was conducted April 13, 2011 through May 15, 2011. The public was notified of the proposed project through media releases, email correspondence, the park's website (www.nps.gov/valr) and on the NPS PEPC website at (<http://parkplanning.nps.gov/>). A public open house meeting was held on April 13th at WWII Valor in the Pacific National Monument Visitor Center (approximately 10 people attended) and a public site tour was held at the project area on April 16, 2011 (five people attended).

Seven oral and 1 written scoping comments were received which 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

The selected alternative incorporates a number of the public comments including utilizing the CPO bungalows for a variety of purposes -- both visitor services and administrative uses. A

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. The PA also outlines the process for continued Section 106 consultation given that the project will be completed in phases. The PA was signed by the NPS, Hawaii SHPO, Advisory Council on Historic Preservation and Historic Hawaii Foundation on March 19, 2012.

WHY THE SELECTED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT EFFECT ON THE QUALITY OF THE HUMAN ENVIRONMENT

The NPS used the following NEPA criteria and factors defined in 40 CFR §1508.27 to evaluate whether the Selected Alternative would have a significant impact on the environment.

Impacts that may have both beneficial and adverse aspects and which on balance may be beneficial, but that may still have significant adverse impacts that require analysis in an EIS.

As fully discussed in the EA, Alternative C (selected alternative) will have no major adverse impacts on natural or cultural resources that would require further environmental analysis through an environmental impact statement (EIS).

Degree of effect on Public Health or Safety.

This action does not affect public health or safety.

Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.

The CPO bungalows are listed on the National Register of Historic Places and are contributing features to the Pearl Harbor National Historic Landmark. However, the mitigation measures, including the Section 106 Programmatic Agreement outlining continued Section 106 consultation ensure no adverse effects to cultural resources.

There are no prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas within the project area.

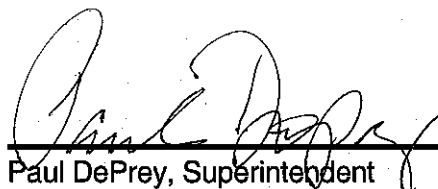
In addition, it should be noted that the project area is in tsunami low risk zone. NOAA's Center for Tsunami Research completed a comprehensive tsunami modeling study for Pearl Harbor. The study concludes that the risk of a destructive tsunami inside Pearl Harbor is low. Model results show minor inundation even for the worst case scenario (Tang 2006). Additionally, storm tidal inundation frequency is inconsequential at this location on Ford Island.

Degree to which effects on the quality of the human environment are likely to be highly controversial.

This action has no controversial effects on the human environment.

precedence. There are no previous, planned, or implemented actions, which in combination with the selected alternative would have significant effects on the human environment. Requirements of the National Environmental Policy Act have been satisfied and preparation of an Environmental Impact Statement is not required. The park will implement the Selected Alternative as soon as practical.

Recommended:



Paul DePrey, Superintendent
WWII Valor in the Pacific National Monument

5/16/12

Date

Approved:



Christine Lehnertz, Regional Director
Pacific West Region, National Park Service

5/23/12

Date

- appropriate opportunities to experience enjoyment of the above resources, to the extent that can be done without impairing them;
- the park's role in contributing to the national dignity, the high public value and integrity, and the superlative environmental quality of the national park system, and the benefit and inspiration provided to the American people by the national park system; and
- any additional attributes encompassed by the specific values and purposes for which the park was established.

Impairment could result from NPS activities in managing the park, visitor activities, or activities undertaken by concessionaires, contractors, and others operating in the park. Impairment could also result from sources or activities outside the park, but this would not be a violation of the 1916 Organic Act unless the NPS was in some way responsible for the action.

How is an Impairment Determination Made?

§1.4.7 of NPS Management Policies 2006 states, "In making a determination of whether there would be an impairment, an NPS decision maker must use his or her professional judgment. This means that the decision-maker must consider any environmental assessments or environmental impact statements required by the National Environmental Policy Act; consultations required under Section 106 of the National Historic Preservation Act; relevant scientific and scholarly studies; advice or insights offered by subject matter experts and others who have relevant knowledge or experience; and the results of civic engagement and public involvement activities relating to the decision."

Non-Impairment Determination for the Selected Alternative

This determination of no impairment has been prepared for the selected alternative as described as preferred alternative in the Rehabilitation of Chief Petty Officer Bungalows on Ford Island Environmental Assessment, and further detailed in the FONSI. The impairment determination does not include discussion of impacts to visitor experience, socioeconomics, public health and safety, environmental justice, land use, park operations, etc. This is because impairment findings relate back to park resources and values, and the above impact topics are not generally considered to be park resources or values according to the 1916 Organic Act, and cannot be impaired in the same way that an action can impair park resources and values.

Impacted resources within the CPO bungalow project area assessed for impairment are as follows:

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.

Under the selected alternative, vegetation would be managed in a manner that results in healthier vegetation. Native plants will be used, if appropriate.

Wildlife and Fish

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. 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.

cultural resources and this project contains both. However, the Pearl Harbor and Ford Island area is dominated by cultural icons.

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.

Summary

In addition to these mitigation measures, a Programmatic Agreement (PA) was executed between the National Park Service, Hawaii State Historic Preservation Officer, Advisory Council on Historic Preservation and Historic Hawaii Foundation to avoid, minimize and mitigate potential adverse impacts to historic properties. With the implementation of the above mitigation measures and the PA, the Park has determined there will be no impairment to historic resources within the CPO bungalow project area.

ERRATA SHEET

REHABILITATION OF CHIEF PETTY OFFICER BUNGALOWS ON FORD ISLAND ENVIRONMENTAL ASSESSMENT, MARCH 2012

National Park Service, U.S. Department of the Interior
WWII Valor in the Pacific National Monument

There is one minor change to the text of the Environmental Assessment. Replace text in mitigation measure Accessibility in the table on page 4. Recipients should attach the Errata to the EA so as to have a complete record of the environmental compliance as completed.

Previous version --

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.

Changed version --

Accessibility

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