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PACIFIC WEST REGIONAL OFFICE Memorandum

L7617 (PWRO-P)

MAY 2 4 2007

Memorandum

To:

Superintendent, USS Arizona Memorial

From:

Regional Director, Pacific West

Subject:

Environmental Compliance for Replacing the Failing Visitor

Center

The finalized Finding of No Significant Impact (FONSI; received May 23) for this important facility replacement 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 supplemental Errata with instructions to attach the document to the EA so as to have a full and complete record of the analysis undertaken. Also attached is a copy of the approved Statement of Finding for floodplains.

The multi-office collaborative efforts, maintained over such a long period and involving so many disciplines, is a success on many levels. Congratulations to all for completing this vital step forward in enhancing the park's potential to welcome and inspire countless visitors for years to come!

Jonathan B Jarvis

Attachments:3

cc:

PAAR-S

DSC-PM

PWR-LIC

ERRATA

Environmental Assessment for the Project to Replace the Failing Visitor Center USS *Arizona* Memorial

The environmental assessment for the Project to Replace the Failing Visitor Center at the USS *Arizona* Memorial was on public review for 60 days, ending April 6, 2007. One letter containing several comments was received that resulted in minor corrections to the EA, which are addressed in an Errata prepared as a technical supplement to the original EA.

Changes in the Environmental Assessment Text

Page 6, paragraph 3, bullet 6

- Delete: "100 square feet of concessions space (refreshments),"
- Insert: "680 square feet of vending space (refreshments) and storage area,"

Page 60, paragraph 5, next to the last sentence

- Delete: "The bag storage facility is in operation daily 7:30 a.m. to 5:30 p.m."
- Insert: "The bag storage facility is in operation daily 6:30 a.m. to 5:30 p.m."

STATEMENT OF FINDINGS FOR EXECUTIVE ORDER 11988 (FLOODPLAIN MANAGEMENT)

USS Arizona Memorial Visitor Center Replacement

Recommended)
Find RIVE	4/23/07
Superintendent, USS Arizona Memorial	Date
Certified for Technical Adequacy and Servicewide Consistency	
Millian Archen	4/27/07
Chief of Water Resources Department	Date
Concurrence	
Larry Nolen	4-10-07
Regional Safety Officer, Pacific West Region, National Park Service	Date
Approved	
Regional Director, Pacific West Region, National Park Service	5/3/67 Date
/	

APPENDIX C

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STATEMENT OF FINDINGS FOR EXECUTIVE ORDER 11988 (FLOODPLAIN MANAGEMENT)

USS Arizona Memorial Visitor Center Replacement

Introduction

In accordance with Executive Order 11988 (Floodplain Management), Director's Order #77-2, and the National Park Service guideline for implementing these orders, including Procedural Manual #37-2, the National Park Service (NPS) has reviewed alternatives for the replacement of the visitor center at the USS *Arizona* Memorial with respect to the impact of the project on floodplain values. This Statement of Findings describes the reasons why encroachment into the floodplain is required to implement the project, the site-specific flood risks involved, and the measures that will be taken to mitigate floodplain impacts.

Justification for Use of Floodplain

The National Park Service is proposing to replace the existing deteriorating visitor center structures at the USS *Arizona* Memorial. The alternatives for the development include constructing new visitor center buildings adjacent to the existing facility to the east and north and relocate the existing boat launch 100 feet west, or moving the visitor center structures to the north of the current location Location of the visitor center facilities outside of the floodplain was found to be unreasonable as the NPS leases the property from the US Navy and the Navy does not have other properties outside of the floodplain available for use by the National Park Service. The development of new visitor center facilities would occur therefore in the existing Navy developed area in Pearl Harbor. As this area is previously disturbed and developed, the proposed action would not further degrade the nature and values of floodplains within this area.

Flood Risk

Federal Emergency Management Agency Flood Insurance Rate Maps (FIRM) do not cover federal lands in Pearl Harbor. Halawa Stream is a perennial stream located adjacent to the proposed visitor center location that carries stormwater runoff from the urban areas of west metro Honolulu. This stream has been engineered and channelized during development of the naval station to carry stormwater from upstream areas. The stream bed is stabilized with riprap at the location of the boat launch Conditions would have to be extreme to cause this stream to exceed bank-full. Civil Defense indicates that the water level in the area may rise 4 feet as a result of a tsunami. Based on the tsunami occurring at high tide, the flood elevation is estimated to be at elevation of between 6 and 7 feet.

APPENDIX C

Mitigation of Risk to People and Structures

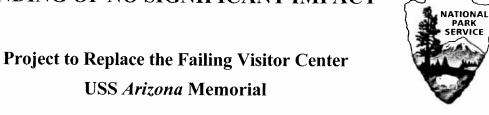
Based on the risk of flooding, the buildings to be constructed would be on foot at elevation of 7 to 8 feet. Therefore, hazard to life and property from tsunami, storm waves, stream flooding, erosion, and subsidence would be reduced.

Summary

Because the USS *Arizona* Memorial visitor center would continue to be located within the Pearl Harbor Naval Base, the NPS would comply with the Department of Defense emergency preparedness and disaster plans that would direct emergency actions and evacuations in the event of flooding. With appropriate disclosure and planning, the risk of flood loss would not increase, and human safety, health and welfare, would not be jeopardized as a result of replacement of the USS *Arizona* Memorial visitor center in the proposed location.



FINDING OF NO SIGNIFICANT IMPACT





Purpose and Need for Action

The National Park Service (NPS) will replace the existing shoreside visitor center for the USS Arizona Memorial (Memorial) located in Honolulu, Hawaii on Pearl Harbor. The Memorial commemorates the lives lost during the December 7, 1941 Japanese attack on Pearl Harbor. The goals of this project are to provide a quality visitor center that enhances visitor understanding of and experience at the memorial, to improve operational efficiency and sustainability of the visitor center; and to provide accessible, efficient facilities in the visitor center for operation of the bookstore and concession sales. This project addresses the park's shoreside facilities only and will not impact the sunken USS Arizona or the memorial that rests above it.

The existing visitor center has an estimated life expectancy of three to eight years (2009 to 2014) due to weakening structural integrity from an unevenly sinking foundation. The buildings were constructed in 1978 on fill placed during development of Peal Harbor naval facilities in the 1940s. Although the visitor center buildings were designed to settle, structural engineers determined they have surpassed the maximum distance that they should have settled. This sinking is causing the buildings to torque, which in turn causes cracks in the concrete. Steel reinforcement bars are now exposed and rusting, which has increased the amount of maintenance repairs. Repairs to the facility are expected to increase until they are not cost effective or reasonable. In addition, the building now receives twice the number of visitors it was designed to support. As a result, visitor experience has been adversely affected by poor visitor flow, long lines, and clusters of visitors waiting to view the interpretive film. Portions of the park's collection, housed in the open air museum at the visitor center, are exposed to light, air, humidity and temperature fluctuations, and insect infestations resulting from inadequately designed museum cases. This contributes to diminished visitor appreciation of important historical artifacts and objects and limits what can be displayed.

Selected Action

The NPS selected action is described as "Alternative B, the Preferred Alternative" in the environmental assessment. There were no changes to Alternative B as described in the EA. The existing theaters will be retained and rehabilitated with the remaining components of the existing visitor center demolished and new buildings constructed adjacent to (on the east and north) the existing facility. The new visitor center structures will be placed in a linear, campus-based fashion leading to the theaters. The existing theaters will be rehabilitated to improve accessibility and visitor flow and increase life expectancy of up to 20 years. The existing boat launch will be relocated 100 feet west to improve visitor access to the Memorial shuttle boats upon leaving the theaters. This option provides for enhanced visitor flow within the visitor center and provides a highly consistent interpretive and educational experience.

The new visitor center will consist of numerous smaller buildings arranged in a linear campus setting utilizing a shade structure that covers the exhibits, plazas, and courtyards beneath. The membrane structure would have steel truss masts or columns that elevate the covering where shade is needed, and will have openings creating courtyards. The site will feature tropical plantings, courtyards, lanais, open views, sun and rain protection, and access to prevailing winds. The design of the surrounding landscape will provide a sense of reverence, encourage recognition and honor, and provide niches where people can reflect privately, and evoke a sense of the importance of the past events in today's world. The existing theaters will be rehabilitated. Materials that can be reused or recycled will be salvaged and reused either on site or elsewhere. Irreclaimable materials and building rubble will be transported off site for recycling or disposal at appropriately licensed facilities.

Year-round visitor services will be available, including a book store, food services, and access to the other three Pearl Harbor Historic Sites venues: the USS *Bowfin*, the USS *Missouri*, and the Pacific Aviation Museum. New office space will be provided for park and concession staff, as well as workspace, storage, and equipment areas.

One goal for this project is to achieve energy efficiency by obtaining LEED (Leadership in Energy Efficient Design) Silver points for sustainability. The new USS *Arizona* Memorial visitor center will reduce energy costs, eliminate waste, and conserve energy resources by using energy efficient and cost effective technology wherever possible. The park will encourage suppliers, permittees, and contractors to follow sustainable practices and address sustainable park and non-park practices in interpretive programs.

Because the USS *Arizona* Memorial visitor center is located within the Pearl Harbor Naval Base, the design of the visitor center complies with the Department of Defense Minimum Antiterrorism Standards for Buildings (UFC 4-010-01).

Public and employee health, safety, and welfare issues addressed in Alternative B include building and safety codes and the regulations of the Architectural Barriers Act Accessibility Standards at the visitor center. Under Alternative B, the existing theaters will be upgraded and retrofitted for visitor safety and accessibility.

The selected action to replace the existing visitor center and rehabilitate the theaters will improve operational sustainability and the quality of education and interpretation offered to visitors. This action will effectively separate the housekeeping and park operations functions from visitor circulation, reducing conflict and interference with visitor flow. The action will also provide structural stability for the entire visitor center and safe passage and egress for individuals with mobility impairments. The project will maintain the integrity of the Pearl Harbor National Historic Landmark District as the new visitor center facilities would be constructed outside of the defined historic landscape, and will be so designed as to blend seamlessly, without intrusive elements, into the larger viewshed so that there will be no effect on the landmark district. New climate-controlled exhibit cases will improve the protection of displayed museum collection objects by controlling air, humidity, light, and temperature, and by preventing access by insects or vermin. Rotation of exhibit items into the display cases will be beneficial by diminishing the exposure of individual items to adverse conditions.

Construction of the new visitor center and rehabilitation of the existing theaters will most likely take place over a three-year period, with a target completion date of December 7, 2009, the 68th anniversary of the attack on Pearl Harbor.

The USS Arizona Memorial and shoreside visitor center will remain open to the extent possible during the three-year construction period. The location of the memorial's cooperating association,

the *Arizona* Memorial Museum Association (AMMA), and refreshment concession operator will be subject to change during demolition and construction. Alternate location(s) and access will be provided to the public where appropriate. The NPS is committed to maintaining operation of the boat service to the Memorial throughout the construction period. However, the location and frequency of operation will be adjusted throughout the construction period based on construction needs and schedules. Once new facilities are complete and the theaters are rehabilitated, the existing visitor center would be demolished. The site would be incorporated into the new visitor center setting with installation of a new landscape designed to complement the solemn nature of the site and the historic district.

Other Alternatives Considered

Alternative A, the No Action Alternative would have continued present management and would leave in place the existing visitor center structures without significant changes to maintenance or operations. No major efforts would be undertaken to stabilize the foundations, improve visitor services, or protect displayed museum collections. Ongoing minor stabilization efforts would continue, although these would not address the critical issues that have reduced the expected lifespan of the structures. Alternative C, Campus Style with Relocated Boat Launch would have moved the visitor center structures to the north of the current location. The museum and exhibit area, theaters, and shared arrival plaza structures would be placed in a clustered fashion while the concessions, administrative offices, restrooms and vending areas would be in a linear north-south trending configuration. The boat launch would be moved to the western shore of the site and would be situated adjacent to the new theaters for easy access.

Alternatives Considered and Dismissed

Move Visitor Center onto Ford Island was dismissed as an option because the U.S. Navy owns the Ford Island property and has indicated that there are no sites on the island available for use by the NPS.

Subcontract out Services was considered and rejected. This alternative considered contracting out services and using the existing maintenance building for non-critical visitor center elements. This alternative was dismissed as it did not meet the mission of the Memorial to provide for interpretation of the historic events of the December 7, 1941 attack and the intangible historic values associated with those events.

Rationale for Selected Action

The selected action meets the following project objectives:

- 1. Provide safe, quality space for basic visitor orientation and education/interpretive activities to enhance the visitor experience and instill respect for the quiet, contemplative objectives of the USS *Arizona* Memorial.
- 2. Improve operational efficiency with sustainable, easily maintained, functional, code-compliant facilities.
- 3. Provide facilities that meet the May 8, 2006 Architectural Barriers Act Accessibility Standards (ABAAS) requirements.

- 4. Provide facilities that meet the security requirements for setbacks and "hardening" (setback is the distance a building or structure is set back from a street or road, stream or shoreline, or any other place which needs protection. Hardening is the process of securing a site, especially against attackers.)
- 5. Provide for AMMA bookstore and limited food and beverage concession operations.
- 6. Provide space that meets museum standards for display and interpretation of museum collections, including historic objects and archival materials. Curatorial materials will be exhibited in climate controlled exhibit cases.

As summarized in the following sections, the selected action best meets the criteria in Section 101 of the National Environmental Policy Act for the environmentally preferred alternative, and, after consideration of anticipated effects described in the environmental assessment, there will be no significant impacts to the human environment as defined by criteria in 40 CFR §1508.27.

Environmentally Preferred Alternative

Section 2.7 D. of the Handbook for the NPS *Director's Order 12 (DO-12, Conservation Planning, Environmental Impact Analysis, and Decision-Making)*, states that the environmentally preferred alternative is the alternative that will promote national environmental policy as expressed in Section 101 of the National Environmental Policy Act (NEPA) which includes the following six criteria:

- 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 to health or safety, or other undesirable and unintended consequences;
- 4. Preserve important historic, cultural, and natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice;
- 5. Enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources; and
- 6. Achieve a balance between population and resource use that will permit high standards of living and a wide sharing of life's amenities.

Analysis of the alternatives indicate that either the Selected Action or Alternative C can be the Environmentally Preferred Alternative for the USS *Arizona* Memorial Visitor Center as both actions are similar in scope and cover a similar area in the same locality. Both alternatives meet the six criteria as evidenced below.

Continuing the current conditions under Alternative A would be less effective in meeting these criteria than either of the proposed action alternatives. Although ongoing and emergency actions would be taken to repair and provide structural stability to the visitor center buildings, the conditions at the visitor center would continue to worsen and effectiveness of repairs would diminish over time. Over time, threats to public health and safety could occur, leading to the closure of portions of the visitor center precluding interpretive and educational opportunities. Therefore, the No Action Alternative would partially meet criterion 2 – assure safe, healthful, and productive surroundings and criterion 3 – attain a wide range of uses without risk to health or safety. Artifacts and museum collections that would be located on site would continue to be displayed in the open

environment setting of the current visitor center and would continue to be exposed to environmental conditions such as light, humidity and hot temperatures that would accelerate deterioration and prohibit the use of them in interpretive programs. As a result, this alternative would not meet criterion 1 and 4. The current visitor center design and facilities available are inadequate to accommodate the high number of visitors that come to the memorial each year resulting in overcrowded and uncomfortable conditions that degrade the visitor experience and impede interpretation and understanding of the memorial. Therefore, this alternative does not achieve a balance between population and resource use that permits a high standard of living as specified in criterion 5.

Development of new visitor center facilities under the Selected Action or Alternative C would satisfy the majority of the criteria listed above. In the long-term, both alternatives would provide new facilities to enhance interpretation and understanding of the historic events of the Pearl Harbor attack and would provide display space that would protect and preserve artifacts and collection materials used on site that would fulfill the responsibility of the memorial to act as environmental trustee for succeeding generations.

New structures constructed under the Selected Action or Alternative C would be fully compliant with Architectural Barriers Act Accessibility Standards (ABAAS) requirements for staff and visitors, thereby assuring for all visitors safe, healthful, and productive surroundings. Under Alternative B, the existing theaters would be upgraded and retrofitted for visitor safety and accessibility.

The Selected Action or Alternative C would result in improved accessibility to new structures and surroundings, improved visitor flow, and reduced crowding by use of open-air spaces and dispersed exhibits. These alternatives would provide facilities that are fully compliant with safety codes and are designed to increase visitor comfort. The design of the buildings and landscaping and the preservation and continued display of historical artifacts would further enhance visitor's recognition and reverence for the events leading up to and during the December 7, 1941 attack. Therefore, these alternatives fully meet criterion 3 and 5 by attaining the widest range of beneficial uses without risks to health or safety or other unintended consequences as well as achieve a balance between population and resource use that permits a high standard of living.

The Selected Action and Alternative C also meet criterion 6 by enhancing the quality of renewable resources and approach the maximum attainable recycling of depletable resources. The new visitor center facilities under both alternatives would be developed using a green building design concept that would reduce energy consumption and costs, eliminate wastes, and conserve resources.

Based on the above evaluation, it has been determined that either the Selected Action or Alternative C could be considered the environmentally preferred alternative.

Mitigation

Under the selected action, best management practices and mitigation measures will be used to prevent or minimize potential adverse effects associated with the project. These practices and measures would be incorporated into the project construction documents and plans. Resource protection measures undertaken during project implementation will include, but will not be limited to, those listed below.

Resource Protection Measures		
Resource Area	Mitigation	Responsibility
General Considerations	The NPS project manager will ensure that construction activity remains confined within the parameters established in compliance documents and that mitigation measures are properly implemented.	NPS Project Director Contractor
	Construction zones will be identified and fenced before beginning the activity and all disturbances will be confined to the fenced areas. All project personnel will be instructed that their activities must be confined to locations within fenced areas. Disturbance beyond the fenced construction zone will be prohibited.	NPS Project Director Contractor
	All fencing, tools, equipment, barricades, signs, surplus materials, and rubbish will be removed from the project work limits upon project completion. Any surfaces or walkways damaged due to work on the project will be repaired to original condition. All demolition debris will be removed from the project site, including all visible concrete and metal pieces.	NPS Project Director Contractor
	A hazardous spill plan will be in place, stating what actions will be taken in the case of a spill and preventive measures to be implemented such as storage and handling of hazardous materials, etc.	NPS Project Director Contractor
	All equipment on the project will be maintained in a clean and well-functioning state to avoid or minimize contamination from automotive fluids; all equipment will be checked daily.	NPS Project Director Contractor
	Staging for construction vehicles and equipment will be located in an area designated by the contracting officer, and will be clearly identified in advance.	NPS Project Director Contractor
Visitor Use and Experience	Majority of material deliveries will be made and disruptive work will be done during low visitation times (such as weekday afternoons), rather than during peak visitation periods.	NPS Project Director Contractor
	Paved areas used by vehicular and pedestrian traffic will be kept clean of construction debris and soils.	NPS Project Director Contractor
	Hours of operation of the park will be adjusted to minimize visitor exposure to vibrations and sounds of pile driving. The park will continue to notify tour operators, agencies, organizations, neighbors, etc about the project on a timely basis.	Park Superintendent NPS Project Director

Resource Protection Measures		
Resource Area	Mitigation	Responsibility
	Project information such as construction phasing, schedule and time changes, or timing of pile driving events, etc will be made available to visitors and local residential housing and commercial users	Park Superintendent NPS Project Director
Cultural Resources	All museum objects will be removed from interpretive exhibits to protect them from pile driving vibrations or other construction related effects, and to ensure their safety. Procedures in the NPS Museum Handbook will be followed to ensure none of the museum collections are lost or damaged. This handbook contains specific procedures for managing museum collections to protect them from theft, flooding, fire and biological infestation; describes ways to package, handle, transport, and store museum collections; and defines appropriate climatic conditions and methods to protect museum collections from light, temperature and humidity variations, chemicals, and dust and air pollution. For those exhibits that are vital to the understanding of the Pearl Harbor story, replicas of the artifacts and documents could be used so that visitors could continue to receive the best possible interpretation of the story.	Park Superintendent NPS Project Director
	Discovered resources will be evaluated for their potential National Register of Historic Places significance by an archaeologist meeting the Secretary of the Interior's standards, and, if needed, mitigation measures will be developed in consultation with the Hawaii State Historic Preservation Officer and appropriate representatives of Native Hawaiian groups. Mitigation measures will incorporate ethnographic concerns; resource significance and preservation needs, and could include such provisions as changes in project design and/or archeological monitoring of the project and data recovery conducted by an archeologist meeting the Secretary of the Interior's standards.	Park Staff
Noise	A press release will be issued by the park before construction begins identifying the projected construction schedule and duration of noise-generating construction activities. In addition, notices regarding the projected construction will be posted on site and mailed to visitor bureaus, bus companies and other tourist oriented businesses and organizations.	Park Superintendent NPS Project Director

	Resource Protection Measures		
Resource Area	Mitigation	Responsibility	
	Contractors will create and implement development-specific noise reduction plans, which will be enforced via contract specifications. Contractors may elect any combination of legal, non-polluting methods to maintain or reduce noise to acceptable levels, as long as those methods do not result in other significant environmental impacts or create a substantial public nuisance. The plan for attenuating construction-related noises will be implemented prior to the initiation of any work that triggers the need for such a plan. The noise reduction plan will be reviewed and approved by the NPS.	NPS Project Director Contractor	
Lightscape Management	All outdoor lighting will be shielded downward so that the bulb is not visible, at bulb height, from the side.	NPS Project Director Contractor	
Public Health and Safety	An accident prevention plan, including job hazard analyses associated with each major phase of the proposed project, will be required. The plan will address fires, power outages, windstorms, the nature of the construction work, site conditions, and required project inspections and safety meetings.	NPS Project Director Contractor	
	Measures to reduce effects of demolition and construction on visitor safety and experience will be implemented, including different locations and types of barriers.	NPS Project Director Contractor	
	All trucks hauling demolition debris and other loose materials that could spill onto paved surfaces will be covered or will maintain adequate freeboard.	NPS Project Director Contractor	
	The use of hazardous materials will be approved in advance, including:	NPS Project Director	
	 Analysis of flammable, poisonous, corrosive, oxidizing, or irritating substances (relative to their safe storage and use), 		
	 Minimization of the use of hazardous chemicals, and 		
	 Use of substances with low or no air quality impacts, and limited persistence or low potential to cause chemical sensitivity. 		

Resource Protection Measures		
Resource Area	Mitigation	Responsibility
and spaces investigation compliant with accordant Section 268 Federal Fact Health Adm 1926.62). Lead and Asbestos Abatement Where approand spaces and removal federal, stat with Occup standards pocovered under practices with the Asbesto	Where appropriate, activities conducted in interior rooms and spaces will be guided by a lead abatement investigation and removal plan. This plan will be compliant with all federal, state, and local requirements in accordance with Title 15, Chapter 53, subchapter IV Section 2688 – Control of Lead-based Paint Hazards at Federal Facilities and the Occupational Safety and Health Administration standard for construction (29 CFR 1926.62).	NPS Project Director Contractor
	Where appropriate, activities conducted in interior rooms and spaces will be guided by an asbestos investigation and removal plan. This plan will be compliant with all federal, state, and local requirements and in accordance with Occupational Safety and Health Administration standards pertaining to employee or worker exposure covered under 29 CFR 1910.1001. Additional work practices will comply with the Construction Standard for the Asbestos Industry (40 CFR 1926.1101 or CFR Title 8 Section 1529).	NPS Project Director Contractor
	Revegetation efforts will include:	NPS Project Director
	Modern sustainable landscape designs, including use of native plants where possible, compatible with the structure and that reduce the amount of irrigation needed, and	Contractor
	Stockpiling and covering stored soils and excavated materials prior to reuse.	
	To prevent soil from eroding:	NPS Project Director
Soils, Vegetation and Water Resources	 Stored topsoil will be overtopped by an anchored matting to prevent siltation from heavy runoff during rainstorms, 	Contractor
	Adequate erosion control or drainage structures will be installed and maintained, and	
	Stockpiling of materials will occur on pavement or in areas exhibiting signs of recent disturbance (bare ground).	
	An adequate hydrocarbon spill containment system will be available on site in case of unexpected spills in the project area. Fueling of construction equipment will be done at least 100 feet from the shoreline.	NPS Project Director Contractor

Resource Protection Measures		
Resource Area	Mitigation	Responsibility
Air Quality	 To the degree possible, impacts to air quality will be mitigated by: Reducing vehicle emissions by keeping equipment properly tuned and maintained in accordance with manufacturers' specifications, and not allowing engines to idle when not in use, Use of best management practices to reduce generation of dust, Limiting the types of chemicals (low volatile organic compound ratings) used in new construction and rehabilitation work, and Reducing trip generation by encouraging carpooling and shipment of full loads only. 	NPS Project Director Contractor
Energy Requirements and Conservation Potential	Use of recycled materials, and energy conserving and environmentally sustainable design will be incorporated into the project, as appropriate.	NPS Project Director Contractor

Why the Selected Action (Preferred Alternative) Will Not Have a Significant Impact on the Human Environment

As defined in 40 CFR §1508.27, significance is determined by examining the following criteria:

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

Whether taken individually or as a whole, impacts of the project do not reach the level of significance which would require analysis in an environmental impact statement.

Implementation of the Selected Action will result in benefits to visitor use and experiences, energy use and conservation potential, and park operations. These benefits will result from improved education and interpretation opportunities, energy and water conservation, reducing/eliminating continual structural foundation repairs, and by providing a fully accessible facility. The new visitor center will enhance the interpretive message by improving the exhibitry, and preserving the continuity and integrity of the Pearl Harbor National Historic Landmark District.

During implementation, the project will have short-term, negligible to moderate, adverse effects on visitor use and experience, socioeconomics, soundscape, and park operations as a result of temporary disturbances related to construction and demolition activities. Short-term, adverse effects of moderate intensity would also occur from financial loss to the concessioner during the three years of construction.

There will also be short-term, minor adverse effects to cultural resources as access to interpretive materials and collections would be limited during the construction period.

Completion of the project will not result in any long-term effects on the Pearl Harbor National Historic Landmark District as the visitor center is outside of the historic district and the planned architecture of the visitor center will not intrude upon the cultural landscape

2. The degree to which public health and safety are affected.

The protection of public health and safety is of primary importance in this project, and short- and long-term, moderate beneficial effects will result. The new visitor center will provide safe passage and emergency egress. Rehabilitation of the theaters and construction of new facilities will remedy the weaknesses that have developed from age and failing foundations and benefit those park staff and visitors.

Construction and demolition may result in short-term, negligible to minor, adverse effects on public health and safety and the soundscape due to increased truck traffic and pile driving. Precautions will be taken to keep the public from coming into contact with construction debris and pile driving would be limited to off-peak hours of visitation. Information will be posted, and ranger presence increased near the construction zones.

3. Any unique characteristics of the area (proximity to historic or cultural resources, wild and scenic rivers, ecologically critical areas, wetlands or floodplains, and so forth).

The USS *Arizona* Memorial visitor center is located in but is not part of the Pearl Harbor National Historic Landmark District. There are no prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas within the project area.

4. The degree to which impacts are likely to be highly controversial.

There were no highly controversial effects identified during the preparation of the environmental assessment or during the public review period.

5. The degree to which the potential impacts are highly uncertain or involve unique or unknown risks.

There were no highly uncertain, unique, or unknown risks associated with implementation of the selected action.

6. Whether the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.

Implementation of the project will neither establish a NPS precedent for future actions with significant effects, nor will it represent a decision in principle about a future consideration.

7. Whether the action is related to other actions that may have individual insignificant impacts but cumulatively significant effects. Significance cannot be avoided by terming an action temporary or breaking it down into small component parts.

Projects that were considered in conjunction with the selected action for their cumulative effects include development of the USS Arizona Memorial Interpretive Program as well as the Commercial Services Plan for the USS Arizona Memorial, Pearl, Integrated Cultural Resources Management Plan, Pearl Harbor Historic Trail, and Honolulu High Capacity Transit Plan. Other developments and projects include the USS Oklahoma and USS Utah memorials and Pacific Aviation Museum, as well as the upcoming site master plan for the Pearl Harbor Historic Partners "gateway" project with

coordinated site planning, shared arrival plaza and ticketing, and improved signage. The long-term effects of these projects will be beneficial and also of negligible to moderate intensity. In combination with the Preferred Alternative, the overall effects will be long-term, minor to moderate, and beneficial. No significant (major) adverse or beneficial effects are anticipated.

8. The degree to which the action may adversely affect properties in or eligible for listing in the National Register of Historic Places, or other significant scientific, archeological, or cultural resources.

The USS *Arizona* Memorial visitor center is located in but is not part of the U.S. Naval Base, Pearl Harbor National Historic Landmark District. (The site is within the historic district boundary, but is not a contributing element because it was constructed since December 7, 1941.) The architecture of the new visitor center will not intrude upon the cultural landscape of the area. Minor, short-term adverse effects will occur during construction as collection objects and interpretive materials will not be accessible during project implementation. The long-term benefits will be of moderate intensity. The project will not have any effects on traditional ethnographic sites valued by Native Hawaiians.

9. The degree to which the action may adversely affect an endangered or threatened species or its habitat.

There are no federal or state-listed threatened or endangered species at the shoreside visitor center site. However the project is near an area where the federally threatened Newell's shearwater (*Puffinus auricularis newelli*) is known to fly. Several other species that are not listed under the Endangered Species Act but that are protected under the Migratory Bird Treaty Act may also transit the area. Bright lights can disorient night flying seabirds, causing them to land on the ground where they are vulnerable to vehicle collisions and non-native predators. As recommended by the US Fish and Wildlife Service in a letter to the park dated June 9, 2006, mitigation of impacts to these birds from light will include redirection downward of shielded outdoor lighting so that the bulb is not visible except from below. With implementation of this mitigation, there will be no adverse effect to the threatened Newell's shearwater or to migratory birds.

10. Whether the action threatens a violation of federal, state, or local law or requirements imposed for the protection of the environment.

The selected action will not violate any federal, state, or local environmental protection laws.

On consideration of the ten criteria above, the NPS has determined there are no major adverse or beneficial impacts which would require further analysis in an environmental impact statement.

Impairment of Park Resources or Values

In addition to reviewing the list of significant criteria, the Pacific Area Director has determined that implementation of the selected action will not constitute an impairment to USS *Arizona* Memorial resources and values. This conclusion is based on a thorough analysis of the environmental impacts described in the project's environmental assessment, relevant scientific studies, and the professional judgment of the decision maker guided by the direction in NPS *Management Policies*. As described in the environmental assessment, project implementation will not result in major, adverse impacts to a resource or value whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation, (2) key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; or (3) identified as a goal in the park's general management plan or other relevant NPS planning document.

Public Involvement and Agency Consultation

Scoping was conducted to inform the public of the proposed project and identify potential environmental issues. Scoping began May 2006 and ran through August 2006 for the park's environmental assessment, in which the park decided to implement an alternative that involved replacing major portions of the visitor center and rehabilitating the two theaters.

In May 2006, approximately 500 newsletters were distributed to the public, elected officials, and other parties who have expressed interest in activities at the USS *Arizona* Memorial. During this phase of scoping the public and interested parties were asked to identify issues, concerns, and ideas related to the project to replace the visitor center.

On August 17 and 19, 2006, the National Park Service held two public open houses at the memorial in which the public was invited to share their concerns, if any, about the project and to provide input on preliminary alternatives. A total of 44 attendees came to these meetings, and their thoughts and concerns about the project were recorded. All of the public and agency comments received were considered in the development of this environmental assessment.

Public outreach for the project generated a range of comments on both the long-term and short-term effects of the project to replace the shoreside visitor center. Those responding to the newsletter and participating in the public meetings expressed desires that the new facility:

- Broaden the perspective of the interpretive message to include a the larger story of Hawaii in WWII such as Native Hawaiian history and culture, stories of other ships and crews, and information on the sunken Japanese midget sub
- Protect valuable artifacts and artwork for long-term enjoyment of visitors
- Provide food and drink services,
- Have improved and expanded restroom facilities, and
- Continue to house the AMMA bookstore.

Questions arose about construction activities and the operation of the site once the new visitor center is complete. These included: Public meeting participants were interested in:

- How will the Pearl Harbor Historic Partners shared arrival plaza function?
- Will a reservation system be implemented?
- How will construction activities be managed to limit effect to local traffic flow, visitors, and commercial service providers?
- How does the plan address the new transit line along King Kamehameha Highway and the new historic trails bike path?

In February 2007, the Environmental Assessment for the Project to Replace the Failing Visitor center at the USS Arizona Memorial was released and made available for public comment for a 60-day period ending April 6, 2007.

An electronic copy of the environmental assessment was made available on the park's website and on the NPS Planning, Environment and Public Comment (PEPC) website during the same period. The NPS also sent copies of the environmental assessment to various local organizations, interested parties, and government agencies for their review and comment. The environmental assessment was also made available at metropolitan and local public libraries.

During the public review period, a total of nine letters and e-mails were received from agencies and interested persons. The comments and NPS responses are outlined below. Comments were analyzed consistent with the guidance provided in the NPS *Director's Order 12*, the NPS guideline for environmental compliance. Comments are considered substantive when they: a) question, with reasonable basis, the accuracy of information in the environmental assessment, b) question, with reasonable basis, the adequacy of the environmental analysis, c) present reasonable alternatives other than those presented in the draft environmental assessment, or d) cause changes or revisions in the proposal. Comments that state a preference for one alternative (or component of an alternative), state opinions, or are outside the scope of the project, are not considered substantive.

The NPS initiated consultations with the Hawaii State Historic Preservation Officer (SHPO) on May 5, 2006 and the SHPO has been kept informed of the project throughout its development. The expectation is that the Section 106 process will conclude successfully with a no adverse effect determination.

In a letter dated March 19, 2007, the U.S. Department of the Army commented that relocation of the dock under either the Selected Action or Alternative C would require a Department of the Army permit under Section 404 of the Clean Water Act.

 The NPS will obtain all necessary federal, state, and local permits prior to project implementation. In regard to protection of local water quality, the permits could include a U.S. Army Corps of Engineers Section 404 permit (for dock relocation) and a National Pollution Discharge Elimination System (NPDES) permit (for stormwater control).

In a letter dated April 12, 2007, the Hawaii Department of Business, Economic Development & Tourism responded to the EA regarding the Coastal Zone Management Act Consistency Determination. The state concurred with the NPS finding that the proposed action was consistent, to the maximum extent practicable, with the Hawaii Coastal Zone Management Program.

In a letter dated March 6, 2007, the Chamber of Commerce of Hawaii noted a preference for construction of new theaters as described for Alternative C. Although this option is feasible, the NPS has several reasons for considering it to be less preferable that retaining the existing theaters.

- As described in the EA, new construction on Pearl Harbor Naval Station must comply with the Department of Defense Minimum Antiterrorism Standards for Buildings. Standoff distances from roadways and parking areas are required for all new buildings that use conventional construction without blast hardening. The required standoff distances from roadways and parking areas are: no construction within 83 feet; buildings within 83-148 feet must be hardened; and no restrictions beyond 148 feet from parking and roadways. This places strict limits on use of the already crowded visitor center site.
- Construction of new theaters would require installation of many foundational piers at the site.
 The NPS wishes to limit noise exposure and environmental impacts during project
 implementation. The noise and vibration generated by pile driving to install the piers would be
 greater than for the selected action.
- Installation of deep foundational piers is a major cost component of the project. As noted in the
 EA, construction costs have been rising rapidly in Hawaii. The NPS must seek cost-effective
 solutions to meet the project objectives within funds available. Installation of additional piledriven piers to support new theaters would add significantly to overall project costs.

In a letter dated March 12, 2007, the Hawaii Tourism Authority submitted a letter to the park commenting on the EA. They support any alternative that would improve the visitor experience in

the "second most visited attraction in the State of Hawaii" by reducing wait times and providing adequate restroom facilities.

State Senator Norman Sakamoto submitted a letter to the park in support of the Selected Action on March 15, 2007.

One letter was received from the public suggesting that the museum and exhibit area be fully climate controlled.

Any portion of the facility housing or displaying museum collection items (objects, specimens, and archival and manuscript collections) will be environmentally controlled to ensure preservation of these items. The Exhibit Plan, currently being undertaken by the park, will include long-term management strategies for protection of the collection items and artifacts maintained in the visitor center.

The park received one letter requesting clarification of several issues related to commercial services at the visitor center. This letter also resulted in two small corrections to the EA, which are addressed in an "Errata" prepared as a technical supplement to the original EA document.

- Why does the EA say that "limited" food and beverage services would be provided? The NPS is in the process of developing a comprehensive Commercial Services Management Plan for the USS Arizona Memorial. Under this plan, space will be allocated for the commercial service operators at the park. In regard to the current refreshment vending, no loss of space for refreshment operations is anticipated.
- Why have a 10,000 square-foot office building when 1000 square feet would suffice? Future development of a new park headquarters and office building will be pursued under a separate planning and compliance effort. This project is referenced in the visitor center EA to facilitate cumulative effects analysis.
- Accessibility at the visitor center is a big problem, especially for the elderly. As described in the EA, the existing visitor center does not meet requirements of the Architectural Barriers Act Accessibility Standards (ABAAS). An accessibility assessment conducted in 2006 revealed several shortcomings, including difficult access, inadequate wheelchair accommodations, and inaccessible restroom facilities. By law, NPS "[f]acilities subject to the Architectural Barriers Act (ABA) must meet the ABAAS if the construction or alteration commences, or the lease is entered into, after May 8, 2006." Accessibility is a standard to be met regardless of the action alternative implemented. The new visitor center will meet all relevant requirements and will be fully accessible.
- Why not allow the tented Pearl Harbor Visitor Center to remain during the construction period? In accordance with the NPS Concession Management Improvement Act of 1998, a comprehensive Commercial Services Plan is underway to determine what services are necessary and appropriate for the USS Arizona Memorial. Once the determination has been made, any concession service found necessary to support the mission of the park will be awarded through competitive selection process following a request for proposals issued to qualified commercial service operators.
- Why is the reservation system an option that was "considered and dismissed"? As stated in the EA, the reservation system is still undergoing evaluation by the NPS. Any reservation system for the USS Arizona Memorial would need to consider the needs of the other Pearl Harbor Historic Sites partners, which is beyond the scope of this visitor center planning effort.

What is the space allocation for the central corridor containing the exhibits, the AMMA bookstore, food service, and theaters referenced in the description of the Selected Action? Design of the visitor center is ongoing and details of the square footage of specific areas are under development. The new visitor center is being designed to meet the demands of 1.5 million visitors per year, and the square footage of areas will reflect this need. As discussed above, spaces for commercial service providers will be addressed and determined under the comprehensive Commercial Services Plan, which is underway.

Two electronic comments were received on the NPS centralized comment system (PEPC) in support of the Selected Action.

The NPS sent the U.S. Fish and Wildlife Service a consultation letter on May 5, 2006, requesting a determination of effects on threatened and endangered species. The park received a response from the U.S. Fish and Wildlife Service on June 9, 2006 addressing the threatened Newell's shearwater, as discussed above.

Three Native Hawaiian groups, the Office of Hawaiian Affairs, Hui Malama I Na Kapuna 'O Hawaii Nei, and the O'aha Island Burial Council were contacted by letter on May 5, 2006. Since that time, ongoing discussions have been conducted through quasi-regular meetings, telephone calls, and personal contacts. Tribal representatives have visited the site and have been helpful in providing assistance on interpretive content and displays.

Conclusion

Implementation of the project to replace the failing visitor center at the USS Arizona Memorial will not constitute an action that normally requires preparation of an environmental impact statement (EIS). The selected action will not have a significant effect on the human environment. Negative environmental impacts that could occur are short- or long-term and negligible to moderate in intensity. There will be no significant impacts on public health, public safety, threatened or endangered species, or other unique characteristics of the site. There are no unmitigated adverse impacts on sites or districts listed in or eligible for listing in the National Register of Historic Places. No uncertain or controversial impacts, unique risks, significant cumulative effects, or elements of precedence were identified. Implementation of the action will not violate any federal, state, or local environmental protection law nor result in the impairment of park resources or values.

Based on the foregoing information, it has been determined that an EIS is not required for this project and thus will not be prepared.

Recommended:

Frank Hays, Pacific Area Director

Approved:

Jonathan B. Jarvis, Regional Director

Pacific West Region