

**Final
ENVIRONMENTAL ASSESSMENT
for
GROUND FORCES MODERNIZATION
MARINE CORPS BASE HAWAII
O'AHU, HAWAI'I**

May 2024



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FINDING OF NO SIGNIFICANT IMPACT FOR GROUND FORCES MODERNIZATION OF EQUIPMENT, INFRASTRUCTURE, AND TRAINING FOR MARINE CORPS GROUND FORCES IN HAWAII, O‘AHU, HAWAI‘I

DEPARTMENT OF DEFENSE

United States Marine Corps

**FINDING OF NO SIGNIFICANT IMPACT FOR GROUND FORCES
MODERNIZATION OF EQUIPMENT, INFRASTRUCTURE, AND TRAINING FOR
MARINE CORPS GROUND FORCES IN HAWAI‘I.**

In accordance with the National Environmental Policy Act (NEPA) (42 United States [U.S.] Code [U.S.C.] Sections 4321–4370h), as implemented by the Council on Environmental Quality regulations (40 Code of Federal Regulations [CFR] Sections 1500–1508); the Fiscal Responsibility Act of 2023 (Public Law 118-5, June 3, 2023); Department of the Navy procedures for implementing NEPA (32 CFR Section 775); and Marine Corps Order 5090.2, the U.S. Marine Corps gives notice that an Environmental Assessment (EA) has been prepared and, based on the analysis contained in the EA, an Environmental Impact Statement (EIS) need not be prepared to modernize equipment, infrastructure, and training for Marine Corps ground forces in Hawai‘i. The Final EA is incorporated by reference into this Finding of No Significant Impact (FONSI).

The EA analyzed the modernization of equipment and infrastructure at Marine Corps Base (MCB) Hawaii Kaneohe Bay as well as training at MCB Hawaii Kaneohe Bay, Marine Corps Training Area Bellows (MCTAB), and Pu‘uloa Range Training Facility (Pu‘uloa RTF). Major project elements included modernizing equipment; upgrading, renovating, and constructing support facilities; and conducting training activities with the modernized equipment to enhance the combat capability of Marine Corps ground forces in Hawai‘i. This document memorializes the finding that the addition of modernized equipment, the construction of preferred alternative facilities as described in Section 2.2.2.1, and the selection of Alternative 1 for training will not have a significant impact on the quality of the environment.

Agency Coordination and Public Involvement: Pursuant to Section 7(a)(2) of the Endangered Species Act (ESA), the Marine Corps conducted informal consultation with the U.S. Fish and Wildlife Service (USFWS) regarding potential impacts to ESA-listed species. In January 2024, the Marine Corps prepared a Final Biological Assessment to initiate informal consultation with the USFWS, Pacific Islands Office, under section 7 of the ESA. The USFWS reviewed and concurred with the Marine Corps’ determination that the equipment transition, preferred facilities’ construction component and the preferred training alternative (Alternative 1) would have no effect or may affect, but is not likely to adversely affect, ESA-listed species at MCB Hawaii Kaneohe Bay, MCTAB, and Pu‘uloa RTF. In accordance with Section 106 of the National Historic Preservation Act (NHPA), the Marine Corps initiated Section 106 consultation with the State Historic Preservation Officer (SHPO) for the undertaking in September 2023. After the Marine Corps added mitigation measures to the undertaking to ensure preservation of potential archaeological deposits in the project area, the SHPO concurred with the Marine Corps’ no adverse effect determination for the proposed action in May 2024. The Marine Corps

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contacted the State of Hawai‘i Office of Planning and Sustainable Development, Planning Division, regarding its determination that the proposed action falls under the Marine Corps’ Coastal Zone Management Act (CZMA) De Minimis Activities List (State of Hawai‘i CZMA letter, July 9, 2009) on November 29, 2023, and the Planning Division acknowledged receipt on November 30, 2023.

The Marine Corps published a notice of availability for the review of the Draft EA in the *Honolulu Star-Advertiser* on December 26, 2023. The public had 30 days to comment on the EA and the Section 106 finding of no adverse effect. Prior to the release of the Draft EA, MCB Hawaii Public Affairs Officers coordinated with the local community at monthly Neighborhood Board meetings and other public engagement opportunities about the proposed action and the associated Draft EA public comment period. Twenty comments were received and are individually addressed in Appendix B of the EA, Public Comments and Responses. Additionally, comments received outside this formal comment period, such as through the Section 106 consultation process, were considered in the development of the Final EA. All comments received were fully considered by the Marine Corps prior to rendering its decision on the proposed action.

Summary of Environmental Effects: In accordance with Council on Environmental Quality regulations, the EA focused analysis on the potential resources most affected by the proposed action (Final EA, Chapter 3), considering the context and intensity of the impacts potentially associated with the action. The Final EA did not identify any significant impacts on the human environment, or on any resource resulting from the proposed action (Final EA, Table S-1, Summary of Potential Impacts). The proposed action would have less than significant impacts to the seven resource categories analyzed in detail in the Final EA: noise, air quality, water resources, cultural resources, biological resources, public health and safety, and transportation.

The proposed action would result in short-term, intermittent noise impacts from the operation of heavy equipment, power and hand tools, and construction vehicles in discrete areas on MCB Hawaii Kaneohe Bay during the construction phase. There are no sensitive human receptors, such as schools or daycare centers, within the proposed construction footprint and all construction would occur in operational areas on MCB Hawaii Kaneohe Bay, which are already subject to industrial and aircraft noise. The proposed action would not change the type and amount of noise produced during training because the modernized equipment operates no louder than the legacy equipment it is replacing. Training would occur in the same locations and consist of the same type and tempo as current ground-based training (Final EA, Section 3.1.2.3). Training transits would not increase over the No-Action Alternative, and would occur along established routes on O‘ahu and on vehicle paths at the training areas.

The proposed action would result in short-term, intermittent air quality impacts due to the operation of construction equipment and contractor vehicles. Construction-related emissions would be well below applicable air quality thresholds and would not significantly impact the

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attainment areas of Hawai‘i and O‘ahu. Training activity would not impact air quality on O‘ahu or Hawai‘i because under Alternative 1 the Marine Corps is not proposing an increase in training activity. The substitution of modernized vehicles for legacy vehicles does not increase overall emissions and would not result in increased travel miles.

The proposed action would result in new development at MCB Hawaii Kaneohe Bay on approximately 3 acres of previously undeveloped landscaped land, representing less than a 1 percent increase in impervious areas. This new development would not directly disturb marine waters, groundwater, surface waters, or wetlands. Stormwater pollution control measures would comply with National Pollutant Discharge Elimination System permit conditions to minimize runoff and pollutants and sediment conveyed by surface runoff. Appropriate best management practices (BMPs) and compliance with regulatory requirements would minimize any temporary, construction-related impacts. All stormwater runoff would be managed by existing on-site storm drainage infrastructure. The proposed training activity would be of similar type and tempo and in the same areas as legacy training and thus would not alter or affect stormwater runoff in any training areas or existing on-site storm drainage infrastructure.

The proposed action would have less than significant impacts to cultural resources, as no construction would occur in areas with archaeological or historic resources and archaeological monitoring would occur during all project-related ground-disturbing activities. Training would have less than significant impacts to cultural resources as the proposal would include activities similar to current ground-based training in type and tempo and location on the ranges. The SHPO concurred with the Marine Corps’ no adverse effect determination for the proposed action in May 2024 based on the Marine Corps commitment to the following mitigation measures to avoid impacts to SIHP Sites 50-80-11-1017 or 50-80-11-5733: the proposed facility in Project 8 will avoid the isolated archaeological deposit in trench T8-5; the project will adhere to excavation restrictions, limiting ground disturbance to a depth of 50 centimeters below surface in the vicinity of the known isolated deposit in trench T8-5; archaeological monitoring will be conducted by a Secretary of the Interior-qualified archaeologist for all ground disturbing activities within the Project 8 footprint; and an Archaeological Monitoring Plan will be submitted to the SHPO for review and approval prior to the start of Project 8. The Marine Corps would continue to comply with procedures established to reduce potential impacts to cultural resources including MCB Hawaii Order 1500.9C and the 2021 MCB Hawaii Integrated Cultural Resources Management Plan.

Wildlife would not be significantly impacted by the proposed action, as construction would occur at previously developed and actively used areas where machinery is in regular use, and appropriate BMPs (Final EA, Section 2.4) would be implemented to minimize impacts to vegetation and wildlife during construction. Proposed training activities would not expand the available training areas at MCB Hawaii Kaneohe Bay, MCTAB, and Pu‘uloa RTF or involve impacts to new areas, and all training would continue to comply with provisions in the Integrated

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Natural Resources Management Plan program and MCB Hawaii Order 1500.9C designed to minimize impacts to terrestrial biological resources.

The proposed action would have less than significant impact to public health and safety. There would be no public access to the construction areas and construction zones would be physically secured and monitored for unauthorized entry. The proposed action would not result in any increase of net explosive ordnance stored at MCB Hawaii Kaneohe Bay. The Marine Corps would continue to follow existing training protocols (identified in Final EA, Section 3.6.1.1) ensuring emergency preparedness, hazardous waste and regulated non-hazardous waste management, airfield and helipad safety, Bird/Wildlife Aircraft Strike Hazard control, wildland fire prevention, and ordnance safety. Training with modernized equipment would not involve "live fire" activities at any training area.

The proposed action would result in a temporary increase in construction traffic at MCB Hawaii. This increase would represent considerably less than 1 percent of average daily traffic volume on H-3 and would have no effect on H-3 traffic. Alternative 1 does not increase training traffic on O'ahu, which currently represents less than 1 percent of the annual average daily traffic on local roads and highways. In the case of large convoys, travel is limited to off-peak hours by MCB Hawaii Order 3060.1, which also identifies specific routes for transiting to and from training areas. Bus routes, bikeways, and access to bikeways would be unaffected.

The proposed action would result in no changes to geological resources, hazardous materials and waste, marine biological resources, socioeconomic, land use, recreation, and infrastructure and utility systems. Proposed construction may provide some minor, temporary beneficial impacts to the local economy from construction-related jobs and purchasing but would not result in any long-term increase in employment.

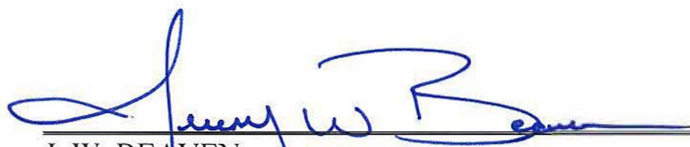
Summary of Cumulative Effects: Cumulative impacts to noise, air quality, water resources, cultural resources, biological resources, public health and safety, and transportation would be less than significant for the proposed action. The past, present, and future actions listed in Table 4-1 of the Final EA would not cumulatively create significant impacts due to the temporal and geographic sequencing of those projects and that most of these future projects consist principally of upgrades to infrastructure in previously developed and disturbed areas. None of the projects would introduce new uses to MCB Hawaii Kaneohe Bay, MCTAB, or Pu'uloa RTF. The past, present, and reasonably foreseeable future actions at MCB Hawaii Kaneohe Bay would include the use of construction equipment that would result in increased temporary intermittent noise levels and air quality impacts within the affected environment. The timing of some of these future projects could potentially overlap temporally and geographically with the 8-year construction period for the proposed action. However, noise level increases would be temporary, typical of standard construction activities, and be mostly indistinguishable from existing operational noise as identified in the noise resource section. Overlapping projects could also

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HAWAII

result in increased temporary air emissions of both criteria pollutants and greenhouse gases; however, the area is in attainment of the National Ambient Air Quality Standards for all criteria pollutants, and the cumulative impact of the identified projects would be well below applicable air quality thresholds. Past, present, and reasonably foreseeable construction projects would incorporate National Pollutant Discharge Elimination System permit regulations, Low Impact Development features to limit the increase in stormwater runoff, and standard BMPs such as those in the Storm Water Management Plan, resulting in less than significant impacts to water quality. Considering the very slight increase in traffic resulting from any construction project, even with overlapping projects, there would be less than significant impacts to traffic volume on the H-3, and no impacts to bike or bus routes.

Finding: After careful review of the EA and all comments, the Marine Corps concludes the proposed action will not result in significant impacts to the quality of the human environment. This FONSI is based on the analysis contained in the attached Final EA, including the BMPs detailed throughout.

The Final EA addressing this proposed action may be obtained by downloading an electronic copy from the State of Hawai'i's Environmental Review Program website (<https://planning.hawaii.gov/erp/>) and on the MCB Hawaii website (<https://www.mcbhawaii.marines.mil/Resources-Services/Pertinent-Information/Ground-Forces-Modernization-EA>) or by contacting: MCBH-EA@stantecgs.com.



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Colonel, U.S. Marine Corps
Commanding Officer
Marine Corps Base Hawaii Kaneohe Bay

03 JUNE 2024
Date

Abstract

Designation: Environmental Assessment

Title of Proposed Action: Ground Forces Modernization

Project Location: Marine Corps Base (MCB) Hawaii, O‘ahu, Hawai‘i

Affected Region: City and County of Honolulu, O‘ahu, Hawai‘i

Action Proponent: Marine Corps Forces, Pacific (MARFORPAC)

Point of Contact: Maj Travis McWhirter, MARFORPAC

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Date: May 2024

The Marine Corps has prepared this Environmental Assessment (EA) in accordance with the National Environmental Policy Act (NEPA), as implemented by the Council on Environmental Quality and Department of the Navy regulations, and Marine Corps Order 5090.2. The proposed action is the modernization of equipment, infrastructure, and training for Marine Corps ground forces in Hawai‘i. The proposed action would occur at Marine Corps Base (MCB) Hawaii and associated training ranges in Hawai‘i.

This EA evaluates the potential environmental impacts of the proposed action to the following resources: noise, air quality, water resources, cultural resources, biological resources, public health and safety, and transportation.

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Summary

S.1 Proposed Action

The 2022 National Defense Strategy, the 2022 Indo-Pacific Strategy of the United States (U.S.), Secretary of Defense 2023 Planning Guidance, and the Commandant of the Marine Corps 2019 Planning Guidance redirected the U.S. Marine Corps' mission from sustained operations ashore to great-power and peer-level competition, with special emphasis on the Pacific. This shift in mission, along with technological advancements in equipment sets, requires adjustments in how the Marine Corps organizes, trains, and equips its force. As part of this restructuring, Marine Corps ground forces assigned to Marine Corps Base (MCB) Hawaii require additional capabilities and equipment to support emerging joint, naval, and Marine Corps operating concepts.

The proposed action is the modernization of equipment, infrastructure, and training for Marine Corps ground forces in Hawai'i. The proposed equipment changes are evolutions of existing equipment and combat capabilities and have operational characteristics similar to those historically used by Marine Corps ground forces in Hawai'i. The facility construction and equipment modernization portions of the proposed action would be implemented over an 8-year period from Fiscal Year (FY) 2024 through FY 2031. These modernized ground forces would continue to conduct activities within the footprint of MCB Hawaii and training ranges in Hawai'i. The training portions of the proposed action would occur at MCB Hawaii Kaneohe Bay, Marine Corps Training Area Bellows (MCTAB), and Pu'uloa Range Training Facility (Pu'uloa RTF) (Figure S-1). The construction portion of the proposed action would occur at MCB Hawaii Kaneohe Bay (Figures S-2 and S-3).

S.2 Purpose of and Need for the Proposed Action

The purpose of the proposed action is to modernize existing Marine Corps ground forces in Hawai'i. The need for the proposed action is to enhance the combat capability of Marine Corps ground forces in Hawai'i, enabling them to meet U.S. Marine Corps responsibilities set forth in Title 10 United States Code (U.S.C.) Section 8063 in support of the U.S. Indo-Pacific Command (USINDOPACOM).

S.3 Alternatives Considered

The Marine Corps considered and eliminated two training alternatives from detailed analysis because they did not meet the purpose and need for the proposed action: Solely Virtual Training and Training Outside Hawai'i. The modernized equipment and required training with the modernized equipment is necessary to support the emerging joint, naval, and Marine Corps operating concepts. As such, there is no alternative equipment or training for that equipment that would enable Marine Corps ground forces in Hawai'i to meet the purpose and need. Therefore, the alternatives analysis focuses on facilities and training tempo.

The Marine Corps considered all reasonable alternatives to support the facilities requirements. The Marine Corps sought to maximize the reuse and renovation of existing facilities; however, existing facilities cannot fully meet the needs for the new equipment and some new construction is required.

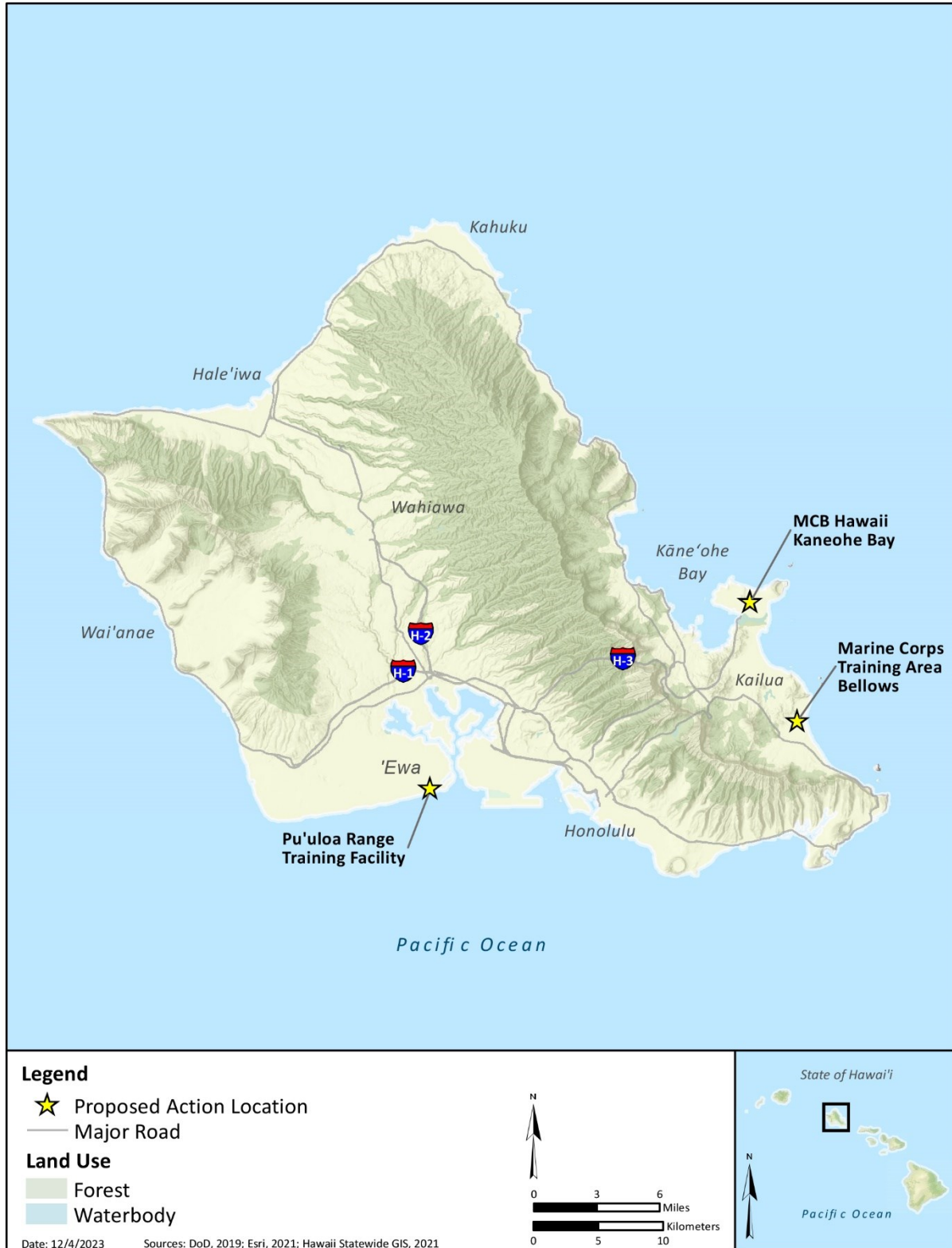


Figure S-1 MCB Hawaii Landholdings

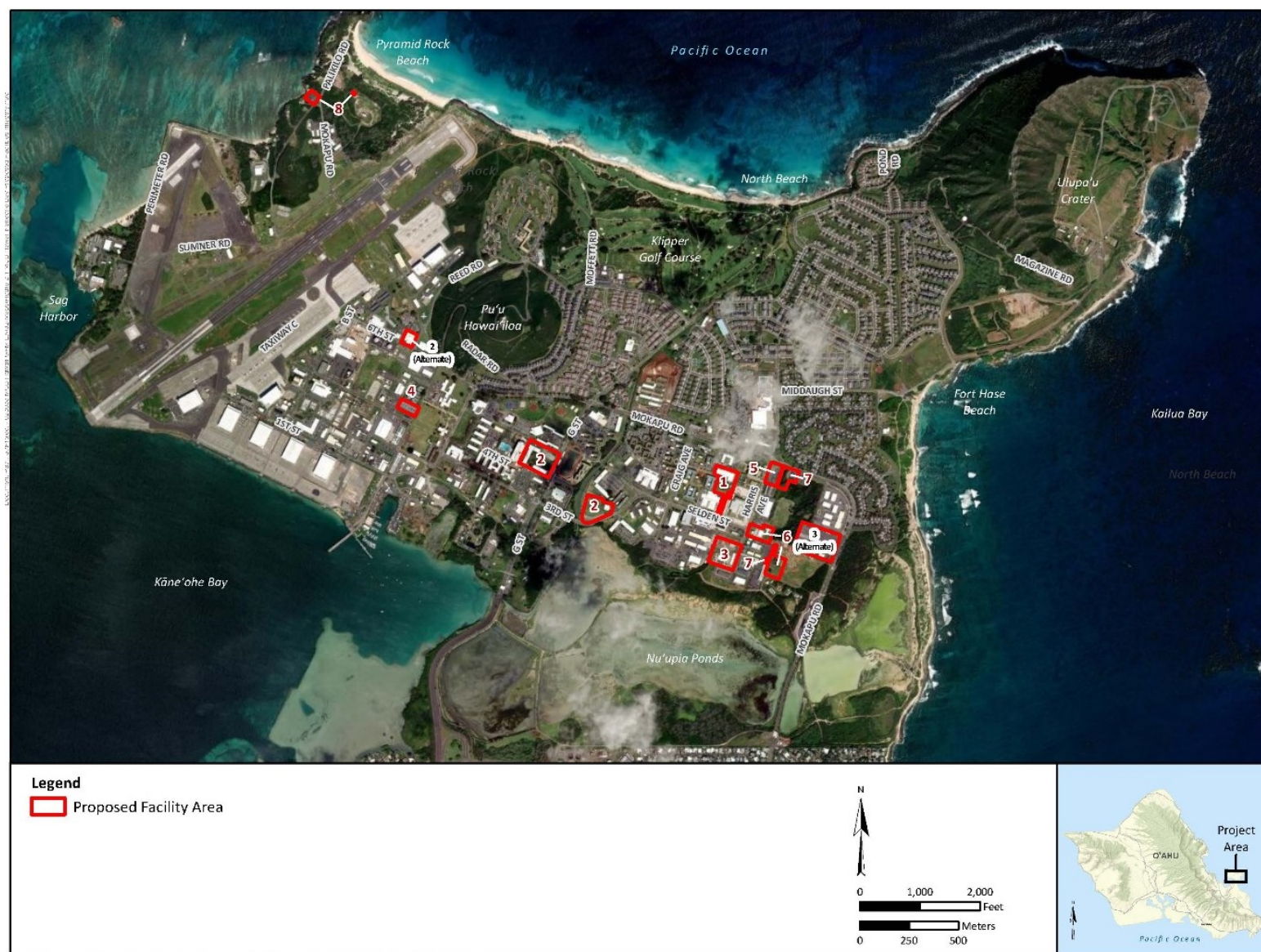


Figure S-2 Proposed Facilities Preferred Locations, MCB Hawaii Kaneohe Bay

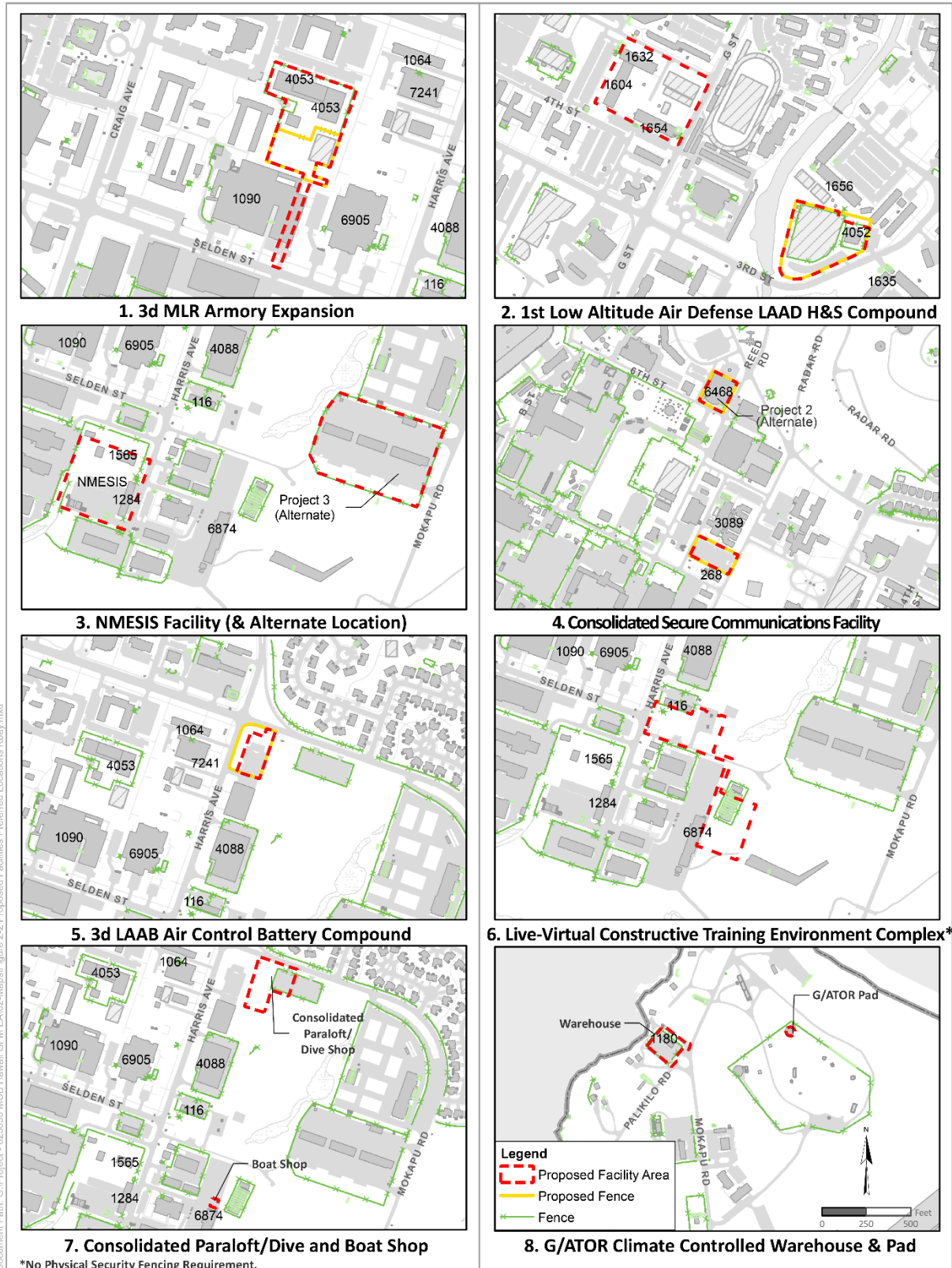


Figure S-3 Proposed Facilities Project Footprints

Alternative 1 for training would include training with modernized equipment of the same type, in the same places, and at the same tempo as existing training with legacy equipment. Alternative 2 for training is identical to Alternative 1, but training tempo would increase to approximately 1,800 events per year, an increase of 300 events over baseline. The preferred alternative for facilities modernization to support the maintenance and storage of the modernized equipment and its associated training would consist of a combination of renovation, demolition, and construction. None of the construction would affect historic resources or have a significant environmental impact. Facilities alternatives are independent of the alternative tempo of training activity with the modernized equipment.

S.4 Summary of Potential Environmental Consequences of the Alternatives and Major Mitigating Actions

Table S-1 presents a summary of potential environmental impacts associated with the proposed action.

S.5 Public and Agency Participation and Intergovernmental Coordination

The Marine Corps solicited public and agency input regarding the proposed action through publication of a Draft EA and through the National Historic Preservation Act (NHPA) Section 106 consultation process. The Marine Corps published a notice of availability for review of the Draft EA in the *Honolulu Star-Advertiser* on December 26, 2023. The public had 30 days to comment on the EA and the NHPA Section 106 process to date. Prior to the release of the Draft EA, the MCB Hawaii Public Affairs Office coordinated with the local community at monthly Neighborhood Board meetings and other public engagement opportunities about the proposed action and the Draft EA public comment period. The Final EA is available on the State of Hawai'i's Environmental Review Program website:

<https://planning.hawaii.gov/erp/> and the MCB Hawaii website:

<https://www.mcbhawaii.marines.mil/Resources-Services/Pertinent-Information/Ground-Forces-Modernization-EA>.

In accordance with Section 106 of the NHPA, the Marine Corps consulted with the Hawai'i State Historic Preservation Officer (SHPO), Native Hawaiian Organizations, interested parties, and the public regarding a finding of no adverse effect to historic properties resulting from the proposed action. The Marine Corps initiated Section 106 consultation with the SHPO for the undertaking in September 2023. After the Marine Corps added mitigation measures to the undertaking to ensure preservation of potential archaeological deposits in the project area, the SHPO concurred with the Marine Corps' no adverse effect determination for the proposed action in May 2024.

Pursuant to Section 7(a)(2) of the Endangered Species Act (ESA), the Marine Corps conducted informal consultation with the U.S. Fish and Wildlife Service (USFWS) regarding potential impacts to ESA-listed species. By adopting measures included in Table 2-4 of the EA, the USFWS concurred with the Marine Corps determination that the preferred facilities construction component and Alternative 1 training would have no effect or may affect, but is not likely to adversely affect, ESA-listed species at MCB Hawaii Kaneohe Bay, MCTAB, and Pu'uloa RTF.

The proposed action falls under the Marine Corps' Coastal Zone Management Act (CZMA) De Minimis Activities List (State of Hawai'i CZMA letter, July 9, 2009). The Marine Corps notified the State of Hawai'i Office of Planning and Sustainable Development, Planning Division, regarding its determination that the action falls under the De Minimis Activities List and would not result in any reasonably foreseeable direct or indirect effects to uses or resources within the Hawai'i Coastal Zone on November 29, 2023. The Planning Division acknowledged the Marine Corps' determination on November 29, 2023.

Table S-1 Summary of Potential Impacts

Resources	Alternative 1	Alternative 2	No-Action Alternative
Noise	<ul style="list-style-type: none"> • Less than significant impacts. • Construction would be localized, temporary, and limited to daytime hours. • Training would be similar to the type and tempo for current training activities and would occur in the same locations. • Noise levels generated from modernized equipment would be the same or slightly less than legacy equipment. 	<ul style="list-style-type: none"> • Noise levels generated from modernized equipment would be the same or slightly less than legacy equipment. • Construction for alternate facilities would have less noise than for preferred facilities due to less overall construction. • The slight increase in training would not be noticeable to community members in the area. 	<ul style="list-style-type: none"> • Under the No-Action Alternative, the proposed action would not occur. Noise impacts would remain at existing levels.
Air Quality	<ul style="list-style-type: none"> • Less than significant impacts. • Training would be similar to the type and tempo for current training activities and would occur in the same locations. • Construction and training activities would only minimally increase emissions and would not substantially contribute to global warming. 	<ul style="list-style-type: none"> • Construction emissions for alternate facilities would be less than for preferred facilities. • Training activities would only minimally increase emissions and would not substantially contribute to global warming. 	<ul style="list-style-type: none"> • Under the No-Action Alternative, the proposed action would not occur and air quality would remain at existing levels.
Water Resources	<ul style="list-style-type: none"> • Less than significant impacts to groundwater, surface water, wetlands, and floodplains. • The proposed action would follow the USEPA NPDES Construction General Permit. • The proposed action would follow a site-specific SWPPP, BMPs, and stormwater runoff protection measures. • Training would be similar to the type and tempo for current training activities and would occur in the same locations. • The Marine Corps would continue to comply with MCB Hawaii Order 1500.9C procedures. 	<ul style="list-style-type: none"> • Alternate facilities would be less than preferred facilities due to a reduced construction footprint. • For training, the increased training activity increases the potential for water resource impacts, but the potential effects would be managed consistent with current management practices for ground-based training at these locations. • The Marine Corps would continue to comply with MCB Hawaii Order 1500.9C procedures. 	<ul style="list-style-type: none"> • Under the No-Action Alternative, the proposed action would not occur and impacts to water resources would remain at existing levels.

Resources	Alternative 1	Alternative 2	No-Action Alternative
Cultural Resources	<ul style="list-style-type: none"> • Less than significant impacts to archaeological resources. Impacts to archaeological sites would be minimized through avoidance measures and archaeological monitoring. • No impacts to historic resources. • Training would be similar to the type and tempo for current training activities and would occur in the same locations. • The Marine Corps would continue to comply with MCB Hawaii Order 1500.9C procedures. 	<ul style="list-style-type: none"> • Alternate facilities construction would occur at fewer locations than preferred facilities construction. • Identical avoidance measures and monitoring procedures would be implemented. • Because adverse effects to cultural resources would be avoided, the increased tempo of Alternative 2 training would not result in additional risk of impacts. • The Marine Corps would continue to comply with MCB Hawaii Order 1500.9C procedures. 	<ul style="list-style-type: none"> • Under the No-Action Alternative, the proposed action would not occur and the impact to cultural resources would remain at existing levels.
Terrestrial Biological Resources	<ul style="list-style-type: none"> • Less than significant impacts to vegetation, wildlife, critical habitat, and ESA-listed species. • Training would be similar to the type and tempo for current training activities and would occur in the same locations. • Training activities would continue to adhere to procedures established in MCB Hawaii Order 1500.9C to reduce potential impacts to terrestrial biological resources. • The preferred alternative either may affect, but is not likely to adversely affect, ESA-listed species or has no effect on other ESA-listed species. 	<ul style="list-style-type: none"> • Alternate facilities construction impacts would be similar to Alternative 1 but reduced due to the smaller disturbance area. • Increased training represents a relatively small change when considered on a daily and weekly basis and would not adversely change impacts to terrestrial biological resources. • Training activities would continue to adhere to procedures established in MCB Hawaii Order 1500.9C to reduce potential impacts to terrestrial biological resources. 	<ul style="list-style-type: none"> • Under the No-Action Alternative, the proposed action would not occur and impacts to terrestrial biological resources would remain at existing levels.

Resources	Alternative 1	Alternative 2	No-Action Alternative
Public Health and Safety	<ul style="list-style-type: none"> • Less than significant impacts. • There would be no public access to the construction areas. Construction zones would be physically secured. • Training would be similar to the type and tempo for current training activities and would occur in the same locations. • The Marine Corps would continue to follow existing transit and training safety protocols to ensure safety. • The Marine Corps would continue to adhere to MCB Hawaii Order 3060.1 regarding convoy transportation safety. • Radar systems would be identical to current radar use. 	<ul style="list-style-type: none"> • Alternate facilities construction component would involve the same safety protocols that are applicable to preferred alternative for facilities construction. • The increased training would represent an average of less than one additional vehicle convoy per week on roadways to MCTAB or Pu'uloa RTF. • The increase in training tempo would be conducted in accordance with safety existing procedures set forth in MCB Hawaii Order 1500.9C. 	<ul style="list-style-type: none"> • Under the No-Action Alternative, the proposed action would not occur and impacts to public health and safety would remain at existing levels.
Transportation	<ul style="list-style-type: none"> • Less than significant impacts. • Construction traffic would be considerably less than 1% of average daily traffic volume on H-3 and have minimal to no effect on H-3 traffic. • Training would be similar to the type and tempo for current training activities and would occur in the same locations. • Traffic associated with training would represent less than 1% of the AADT on local roads and highways. • Traffic associated with training would not affect bus routes or bikeways. 	<ul style="list-style-type: none"> • Impacts from alternate facilities construction would be less than preferred facilities construction. • Increased traffic associated with training would represent less than 1% of the AADT on local roads and highways. • Increased traffic associated with training would not affect bus routes or bikeways. 	<ul style="list-style-type: none"> • Under the No-Action Alternative, the proposed action would not occur and impacts to transportation would remain at existing levels.

Legend: % = percent; AADT = Annual Average Daily Traffic; ESA = Endangered Species Act; MCB = Marine Corps Base; MCTAB = Marine Corps Training Area Bellows; NPDES = National Pollutant Discharge Elimination System; RTF = Range Training Facility; SWPPP = Stormwater Pollution Prevention Plan; USEPA = United States Environmental Protection Agency.

Environmental Assessment

Ground Forces Modernization

Marine Corps Base Hawaii

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Abbreviations and Acronyms

Item	Definition	Item	Definition
%	Percent	FCC	Federal Communications Commission
AADT	Annual Average Daily Traffic	FEMA	Federal Emergency Management Agency
AAV	Amphibious Assault Vehicle	FY	Fiscal Year
AFCEC	Air Force Civil Engineer Center	G/ATOR	Ground/Air Task-Oriented Radar
APE	Area of Potential Effects	GBAD	Ground Based Air Defense
BASH	Bird/Wildlife Aircraft Strike Hazard	GFM	Ground Forces Modernization
BMP	Best Management Practice	GHG	Greenhouse Gas
C-UAS	Counter-Unmanned Aircraft System	H&S	Headquarters and Service
CAAT	Combined Anti-Armor Team	HAR	Hawai'i Administrative Rule
CEG	Communications Equipment Group	HDOT	Hawai'i Department of Transportation
CEQ	Council on Environmental Quality	HMMWV	High Mobility Multi-Wheeled Vehicle
CFR	Code of Federal Regulations	ICRMP	Integrated Cultural Resources Management Plan
CO	Carbon Monoxide	INRMP	Integrated Natural Resources Management Plan
CO ₂	Carbon Dioxide	JLTV	Joint Light Tactical Vehicle
CRMZ	Cultural Resource Management Zone	L-MADIS	Light Marine Air Defense Integrated System
CWA	Clean Water Act	LAAB	Littoral Anti-Air Battalion
CZMA	Coastal Zone Management Act	LAAD	Low-Altitude Air Defense
dB	Decibel	LID	Low Impact Development
dba	A-weighted Decibel	LOS	Level of Service
DNL	Day-Night Average Sound Level	LZ	Landing Zone
DoD	United States Department of Defense	MADIS	Marine Air Defense Integrated System
DOH	Hawai'i State Department of Health	Marine Corps	United States Marine Corps
EA	Environmental Assessment	MBA	Mōkapu Burial Area
EABO	Expeditionary Advanced Base Operations	MBTA	Migratory Bird Treaty Act
ECPD	Environmental Compliance and Protection Division	MCB	Marine Corps Base
EO	Executive Order	MCTAB	Marine Corps Training Area Bellows
ESA	Endangered Species Act	MLR	Marine Littoral Regiment
FAA	Federal Aviation Administration	mm	millimeter
		MOUT	Military Operations on Urbanized Terrain

Item	Definition	Item	Definition
MS4	Municipal Separate Storm Sewer System	PM ₁₀	Particulate Matter Less Than or Equal to 10 Micrometers in Diameter
MTVR	Medium Tactical Vehicle Replacement	REG	Radar Equipment Group
NAAQS	National Ambient Air Quality Standards	REVA	Range Environmental Vulnerability Assessment
NAGPRA	Native American Graves Protection and Repatriation Act	RIMPAC	Rim of the Pacific
NAS	Naval Air Station	ROGUE	Remote Operated Ground Unmanned Expeditionary
NAVFAC	Naval Facilities Engineering Systems Command	RTA	Range and Training Area
Navy	United States Department of the Navy	RTF	Range Training Facility
NEPA	National Environmental Policy Act	SHPO	Hawai'i State Historic Preservation Officer
NHPA	National Historic Preservation Act	SIF	Stand-in Force
NLU	Naval Strike Missile Launcher Unit	SIHP	Hawai'i State Inventory of Historic Places
NMESIS	Navy/Marine Corps Expeditionary Ship Interdiction System	SO ₂	Sulfur Dioxide
NOAA	National Oceanic and Atmospheric Administration	SOP	Standard Operating Procedure
NO _x	Nitrogen Oxides	SWPPP	Storm Water Pollution Prevention Plan
NPDES	National Pollutant Discharge Elimination System	U.S.	United States
NRHP	National Register of Historic Places	UAS	Unmanned Aircraft System
NSM	Naval Strike Missile	ULTV	Ultralight Tactical Vehicle
PEG	Power Equipment Group	U.S.C.	United States Code
PM _{2.5}	Particulate Matter Less Than or Equal to 2.5 Micrometers in Diameter	USEPA	United States Environmental Protection Agency
		USFWS	United States Fish and Wildlife Service
		USINDOPACOM	United States Indo-Pacific Command
		UTV	Utility Task Vehicle
		VOC	Volatile Organic Compound
		WWII	World War II

1 Purpose of and Need for the Proposed Action

1.1 Introduction

The 2022 National Defense Strategy, the 2022 Indo-Pacific Strategy of the United States (U.S.), Secretary of Defense 2023 Planning Guidance, and the Commandant of the Marine Corps 2019 Planning Guidance redirected the U.S. Marine Corps' mission from sustained operations ashore to great-power and peer-level competition, with special emphasis on the Pacific. This shift in mission, along with technological advancements in equipment sets, requires adjustments in how the Marine Corps organizes, trains, and equips its force.

As part of this restructuring, Marine Corps ground forces assigned to Marine Corps Base (MCB) Hawaii require additional capabilities and equipment to support emerging joint, naval, and Marine Corps operating concepts. The proposed action is the modernization of equipment, infrastructure, and training for Marine Corps ground forces in Hawai'i. The proposed equipment changes are evolutions of existing equipment and combat capabilities and have operational characteristics similar to those historically used by Marine Corps ground forces in Hawai'i. The facility construction and equipment modernization portions of the proposed action would be implemented over an 8-year period from Fiscal Year (FY) 2024 through FY 2031. These modernized ground forces would continue to conduct activities within the footprint of MCB Hawaii and training ranges in Hawai'i.

“[The U.S. Marine Corps] must pursue transformational capabilities that will provide naval fleets and joint force commanders with a competitive advantage in the gray zone and during contingency.”

“[M]odest and incremental improvements to our existing force structure and legacy capabilities would be insufficient to overcome evolving threat capabilities.”

Commandant of the Marine Corps David H. Berger, March 2020

Pursuant to Council on Environmental Quality (CEQ) regulations (40 Code of Federal Regulations [CFR] Parts 1500–1508) implementing the National Environmental Policy Act (NEPA) (42 United States Code [U.S.C. §§ 4321, et seq.], the Fiscal Responsibility Act of 2023 (Public Law 118-5, June 3, 2023), U.S. Department of the Navy (Navy) Regulations (32 CFR Part 775), and Marine Corps Order 5090.2, the Marine Corps is preparing this Environmental Assessment (EA) to address the environmental impacts of the proposed action.

1.2 Location

The proposed action would occur at MCB Hawaii Kaneohe Bay and associated Marine Corps training areas on O'ahu (Figures 1-1 to 1-5). While training activities would also occur on non-Marine Corps controlled ranges on O'ahu and elsewhere, as well as during coordinated Department of Defense (DoD) and joint exercises, such training activity is not analyzed in this action as explained in Section 2.1.3.

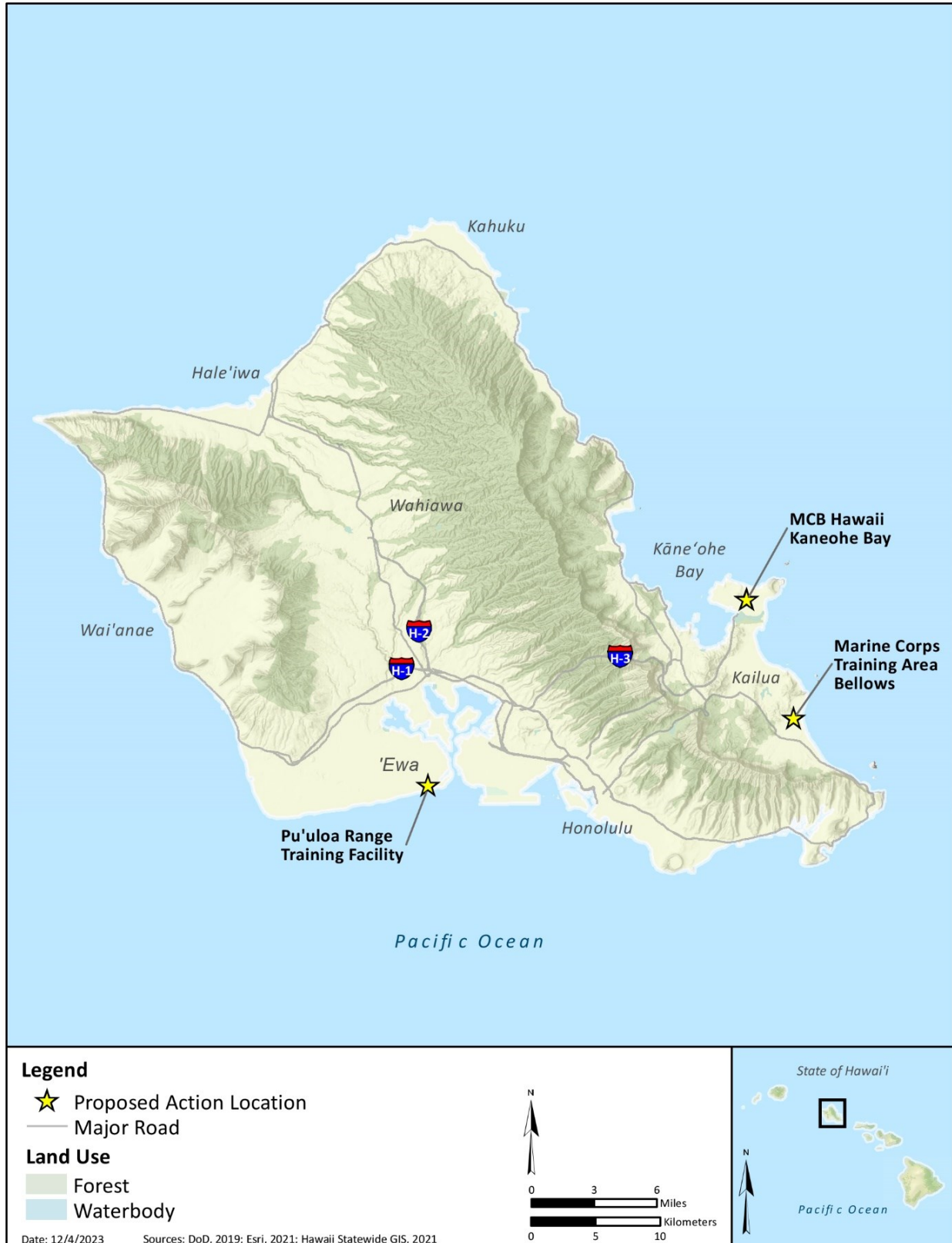


Figure 1-1 MCB Hawaii Landholdings



Figure 1-2 MCB Hawaii Kaneohe Bay



Figure 1-3 MCB Hawaii Kaneohe Bay Training Areas at Ulupa'u Crater RTF



Figure 1-4 MCB Hawaii, MCTAB

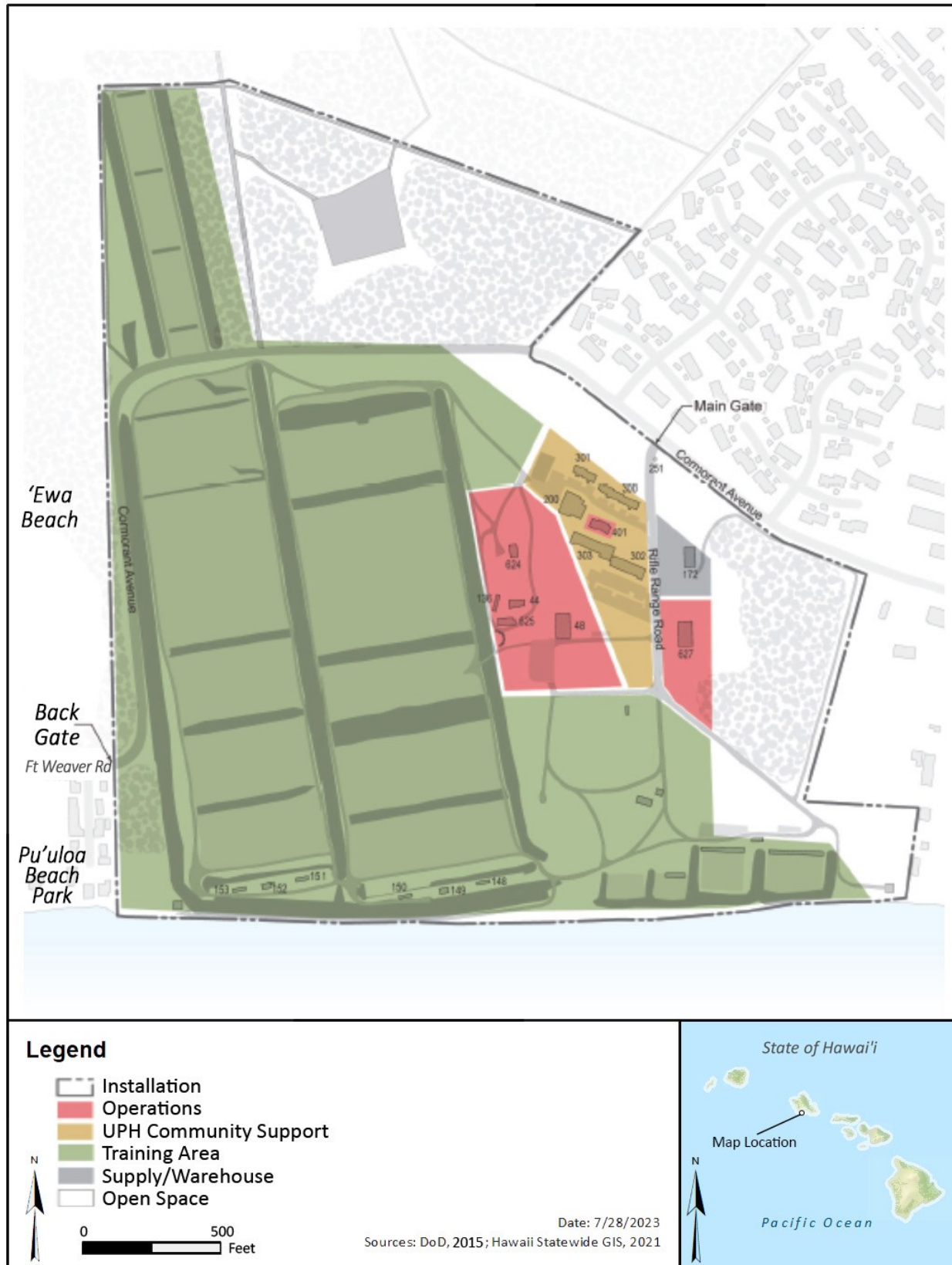


Figure 1-5 MCB Hawaii, Pu'uloa RTF

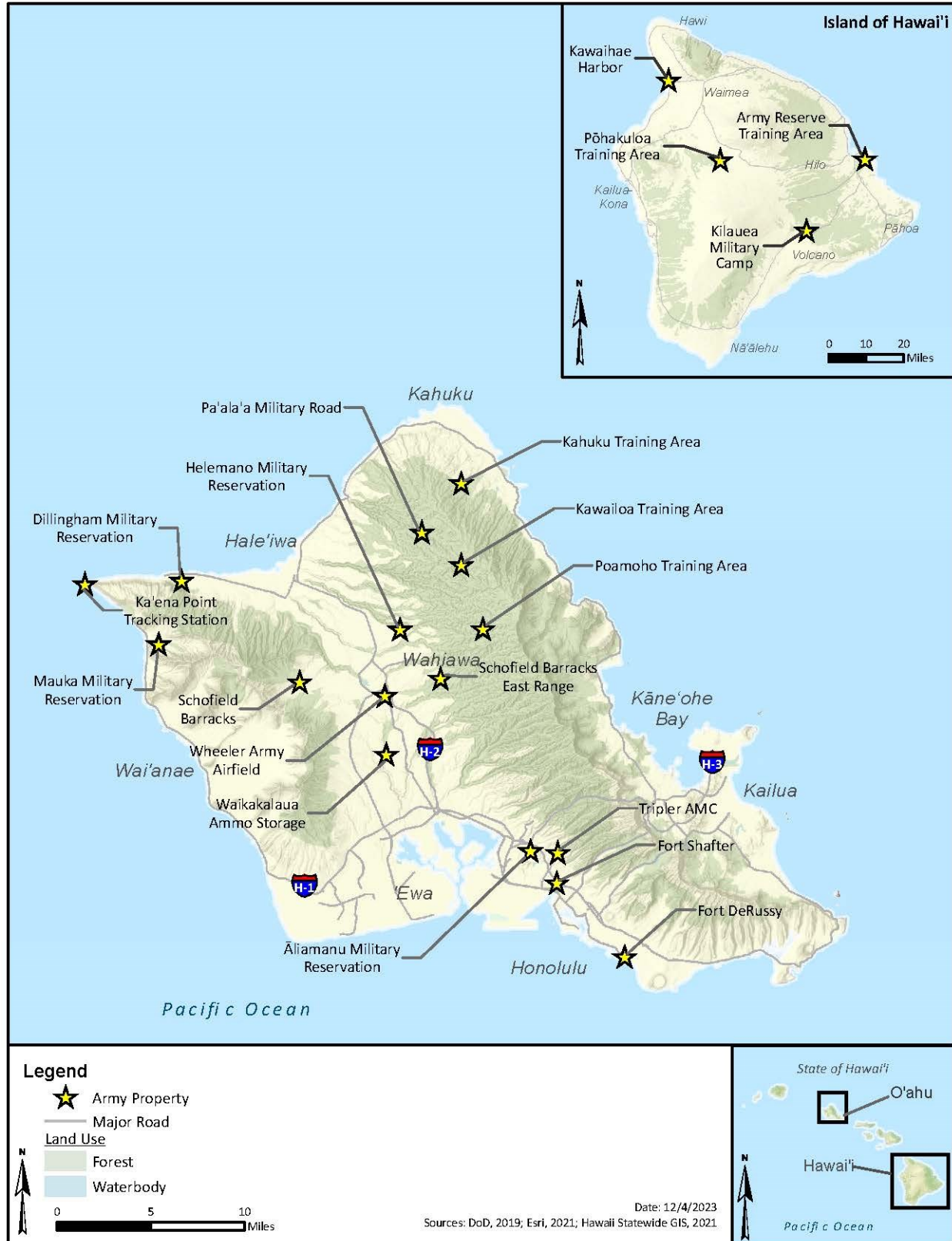


Figure 1-6 Army Areas in Hawai'i

1.3 Purpose of and Need for the Proposed Action

The purpose of the proposed action is to modernize existing Marine Corps ground forces in Hawai'i. The need for the proposed action is to enhance the combat capability of Marine Corps ground forces in Hawai'i, enabling them to meet U.S. Marine Corps responsibilities set forth in Title 10 U.S.C. Section 8063 in support of the U.S. Indo-Pacific Command (USINDOPACOM).

1.4 Scope of Environmental Analysis

This EA includes an analysis of potential environmental impacts associated with the proposed action. The process for identifying resources analyzed in this EA is summarized in Chapter 3, *Introduction*. The environmental resources analyzed in detail include:

- Noise
- Air Quality
- Water Resources
- Cultural Resources
- Terrestrial Biological Resources
- Public Health and Safety
- Transportation

1.5 Relevant Laws and Regulations

The Marine Corps has prepared this EA based upon federal and state laws, statutes, regulations, and policies pertinent to the implementation of the proposed action (Appendix A).

1.6 Public and Agency Participation and Intergovernmental Coordination

The Marine Corps solicited public and agency input regarding the proposed action through publication of a Draft EA and through the National Historic Preservation Act (NHPA) Section 106 consultation process. The Marine Corps published a notice of availability for review of the Draft EA in the *Honolulu Star-Advertiser* on December 26, 2023. The public had 30 days to comment on the EA as well as the NHPA Section 106 process to date. Prior to the release of the Draft EA, the MCB Hawaii Public Affairs Office coordinated with the local community at monthly Neighborhood Board meetings and other public engagement opportunities about the proposed action and the Draft EA public comment period. The Final EA is available on the State of Hawai'i's Environmental Review Program website:

<https://planning.hawaii.gov/erp> and the MCB Hawaii website:

<https://www.mcbhawaii.marines.mil/Resources-Services/Pertinent-Information/Ground-Forces-Modernization-EA>.

Public comments on the Draft EA were considered in the development of the Final EA prior to the Marine Corps rendering its decision on the proposed action. A detailed summary of public comments, revisions made to the EA in response to comments, and responses to comments are provided in Appendix B.

In accordance with Section 106 of the NHPA, the Marine Corps consulted with the Hawai'i State Historic Preservation Officer (SHPO), Native Hawaiian Organizations, interested parties, and the public regarding

a finding of no adverse effect to historic properties resulting from the proposed action. The Marine Corps initiated Section 106 consultation with the SHPO for the undertaking in September 2023 (Appendix C). After the Marine Corps added mitigation measures to the undertaking to ensure preservation of potential archaeological deposits in the project area, SHPO concurred with the Marine Corps' no adverse effect determination for the proposed action in May 2024.

Pursuant to Section 7(a)(2) of the Endangered Species Act (ESA), the Marine Corps conducted informal consultation with the U.S. Fish and Wildlife Service (USFWS) regarding potential impacts to ESA-listed species. With the assumption of adopting measures included in Table 2-4 of the EA, the USFWS concurred with the Marine Corps determination that the preferred facilities construction component and Alternative 1 training would have no effect or may affect, but is not likely to adversely affect, ESA-listed species at MCB Hawaii Kaneohe Bay, MCTAB, and Pu'uloa RTF (Appendix D).

The proposed action falls under the Marine Corps' Coastal Zone Management Act (CZMA) De Minimis Activities List (State of Hawai'i CZMA letter, July 9, 2009). The Marine Corps notified the State of Hawai'i Office of Planning and Sustainable Development, Planning Division, and the Planning Division acknowledged the Marine Corps' determination on November 29, 2023 (see CZMA correspondence in Appendix E).

1.7 Permits and Approvals

Permits and approvals necessary for the proposed action include either: (a) an application for a National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) permit, which will be processed through the Hawai'i State Department of Health (DOH); or (b) an application for coverage under the State of Hawai'i general permit, which is required for discharges of stormwater associated with construction activities in excess of 1 acre (DOH, 2023). Construction projects and vehicle maintenance would fit within the existing MCB Hawaii Kaneohe Bay oil/water separator capacity and remain within MCB Hawaii Kaneohe Bay solid waste management and hazardous waste management plan capacity thresholds. The Marine Corps will continue to coordinate with the State of Hawai'i and U.S. Environmental Protection Agency (USEPA) to ensure all necessary permits are obtained for the proposed action.

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2 Proposed Action and Alternatives

This chapter describes the proposed action, alternatives development (including alternatives considered but not carried forward for analysis), Alternatives 1 and 2, the No-Action Alternative, and best management practices (BMPs) incorporated into the proposed action to avoid or reduce environmental impacts.

2.1 Proposed Action

The proposed action is the modernization of equipment, infrastructure, and training for Marine Corps ground forces in Hawai'i. The proposed action would occur at MCB Hawaii Kaneohe Bay and associated training ranges in Hawai'i. The proposed action has three components: (1) modernize equipment (Section 2.1.1); (2) upgrade, renovate, and construct supporting facilities (Section 2.1.2); and (3) conduct training activities with the modernized equipment (Section 2.1.3). There would be no change in the number of Marine Corps ground forces personnel in Hawai'i because of the proposed action.

2.1.1 Equipment

The proposed action would involve modernization of equipment used by Marine Corps ground forces in Hawai'i. This includes vehicles and weapons systems with greater mobility designed for modern expeditionary warfare. The proposed equipment changes are evolutions of existing equipment and combat capabilities with operational characteristics similar to those historically used by Marine Corps ground forces in Hawai'i. The modernized equipment would be stored and maintained at MCB Hawaii Kaneohe Bay. The proposed action would not result in an increase in net explosive ordnance stored at MCB Hawaii Kaneohe Bay. For training events, the equipment and personnel would transit over base and public roadways (depending on the Range and Training Area [RTA]) from MCB Hawaii Kaneohe Bay to the training area and then back to MCB Hawaii Kaneohe Bay). This would facilitate Marine Corps training consistent with Stand-in Force (SIF) and Expeditionary Advanced Base Operations (EABO) concepts (see conceptual illustration below).

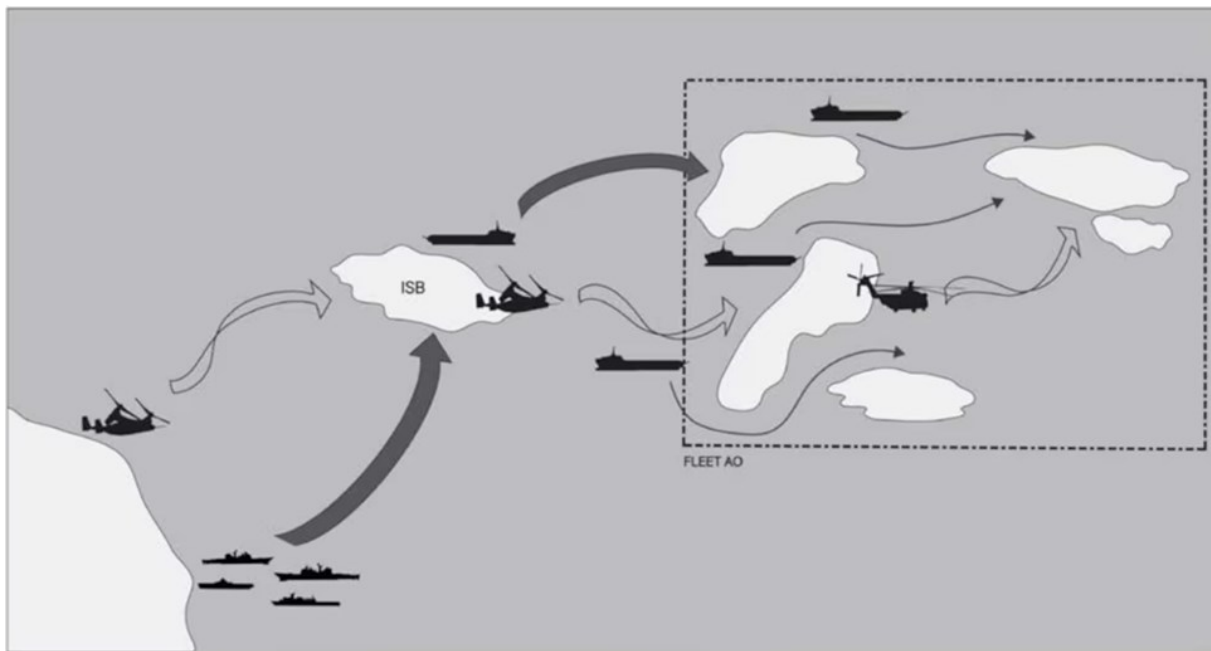


Illustration 1: Expeditionary Advanced Base Operations Concept

The SIF consists of small, low signature (i.e., difficult to detect), mobile forces. One of the characteristics of a SIF is the ability to conduct EABO operations, which consist of the employment of small, low signature, persistent, and relatively easy to maintain and sustain naval expeditionary forces from temporary locations.

This section includes an overview, equipment summary, and training summary for each equipment modernization type. A more detailed description of training events with the modernized equipment is provided in Section 2.1.3.

2.1.1.1 Navy/Marine Corps Expeditionary Ship Interdiction System (NMESIS)

- **Overview.** The NMESIS (Photos 1 and 2) provides the capability to fire anti-ship missiles from land. It combines the Naval Strike Missile (NSM) Launcher Unit (NLU) with the Remote Operated Ground Unmanned Expeditionary (ROGUE) Fires Carrier. The ROGUE Fires Carrier consists of a missile launcher built on top of a joint light tactical vehicle (JLTV) chassis. The JLTV family of vehicles uses a modular concept to provide mobility for personnel and payloads across the full spectrum of military operations. The JLTV is currently in use by all services on all Hawai'i military training ranges.
- **Equipment.** At full operational capability, NMESIS batteries aboard MCB Hawaii Kaneohe Bay would be composed of 18 launchers separated into two platoons of nine launchers each (Photo 1). The platoons are further subdivided into three sections of three launchers each. Each NMESIS section would consist of five Marines and five JLTV vehicles (Photo 2): one leader JLTV vehicle, one command and control JLTV vehicle, and three JLTV launcher vehicles. Unlike the current cannon artillery sections of approximately 14 Marines, which use two Medium Tactical Vehicle Replacement (MTVR) trucks and two trailers to carry their launchers and munitions, the NMESIS launcher primarily uses the smaller JLTVs for transportation.
- **Training.** As part of the Marine Corps' ground force modernization efforts, Marines would implement the EABO concepts described above utilizing small, low signature, mobile forces. Compared to cannon artillery training previously conducted on military training ranges in Hawai'i, the majority of NMESIS training would involve a smaller transportation vehicle (JLTV vs MTVR), a smaller number of personnel and equipment per training cycle, a smaller footprint, and would not involve "live fire" of the weapon system on O'ahu.



Photo 1: NMESIS Launcher



Photo 2: NMESIS Section

As seen in Photo 2, the three vehicle types that make up a NMESIS section all utilize the same JLTV chassis but consist of different modules on top of the JLTV chassis.

2.1.1.2 Marine Air Defense Integrated System (MADIS) and Light MADIS (L-MADIS)

MADIS:

- **Overview.** The MADIS (Photo 3) represents the Marine Corps' modernization of its Ground Based Air Defense (GBAD) and Counter-Unmanned Aircraft System (C-UAS) capabilities. MADIS is a maneuverable, ground-based air defense system that provides the Marine Corps with an improved mobile, short-range air defense capability in support of expeditionary bases and maneuvering units.
- **Equipment.** The MADIS, like the NMESIS system, utilizes the JLTV chassis currently in use by all services on all Hawai'i military training ranges. This system is designed to detect, track, identify, and defeat aerial threats at short range. Two firing batteries are separated into four platoons with three systems each and a headquarters element with one system. The platoons are further subdivided into three sections with one system and eight Marines each. Each MADIS section would consist of eight Marines and four JLTV vehicles. This air defense system requires each section to operate two complementary vehicles, the MADIS Mk1 and Mk2. The MADIS Mk1 vehicle is responsible for neutralizing fixed- and rotary-wing aircraft, while the MADIS Mk2 provides command and control for both vehicles. This two-vehicle system has technology and weaponry that is similar to equipment currently used on Hawai'i ranges, i.e., Stinger missiles, RPS-62-S band radar, and 30 millimeter [mm] direct fire weapons.
- **Training.** As part of the Marine Corps' ground forces modernization efforts, Marine Corps ground forces in Hawai'i would implement EABO concepts utilizing small, low signature, mobile forces. Compared to the vehicle footprint and personnel of the legacy Infantry Battalion Weapons Company Combined Anti-Armor Teams (CAAT), which would employ a section comprised of four high-mobility multi-wheeled vehicles (HMMWVs) working as a complementary pair with approximately 16 Marines, MADIS training would involve a smaller number of personnel and equipment per training cycle and would not involve "live fire" of the weapon system on O'ahu.



Photo 3: MADIS

L-MADIS:

- **Overview.** The L-MADIS (Photo 4) is a scaled down capability set of the MADIS that offers the Marine Corps greater flexibility in employment of C-UAS operations due to its ability to operate in austere environments. It provides the Marine Corps with the capability to disrupt the command and control of enemy Unmanned Aircraft Systems (UAS); however, it lacks the ability to defeat enemy UAS with its own offensive capabilities.
- **Equipment.** The L-MADIS is mounted to an ultralight tactical vehicle (ULTV), which is similar to a commercial off-road, all-terrain vehicle. The ULTV, a modular, off-road utility vehicle, replaces the Utility Task Vehicle (UTV). The L-MADIS system uses two ULTVs working in tandem. One vehicle uses the RPS-62 radar (the same radar the MADIS uses) for detection and surveillance and includes an electronic attack capability to defeat UAS. Acting as a support vehicle, the second L-MADIS transmits data between vehicles and air/ground platforms. The L-MADIS' small size allows it to be transported by CH-53s and MV-22s and is more maneuverable than the MADIS.

Training. Like the NMESIS and MADIS systems, the L-MADIS is part of the Marine Corps' ground forces modernization efforts utilizing EABO concepts. After being transported to the training area via aircraft or flatbed tractor trailer, personnel will practice operating the vehicle on the range by acquiring a simulated target, and virtually testing the command, control, and radar functions of the system. L-MADIS training would involve smaller numbers of personnel and equipment per training cycle than legacy equipment.



Photo 4: L-MADIS

2.1.1.3 AN/TPS 80 Ground/Air Task-Oriented Radar (G/ATOR)

- Overview. The G/ATOR (Photo 5) is a three dimensional, short/medium range, multi-role radar system that transmits in the S Band (2–4 gigahertz) frequency range – the same frequency range used daily on O‘ahu by civilian and military radars on the island. It provides surveillance of airspace to provide accurate location, altitude, direction, and identification of aircraft. The radar information can then be used to ensure the safe flight of aircraft through routing instructions passed by air traffic controllers. Additionally, in tactical situations, the radar provides early warning of enemy air attack or can cue other air defense units. The G/ATOR would replace five legacy radar systems and, depending on the “block” of software used, can support various missions such as air defense and surveillance, artillery operations, and Expeditionary Airport Surveillance Radar capability.
- Equipment. The G/ATOR consists of three subsystems. The first subsystem is the Radar Equipment Group (REG), which consists of the radar array towed on a trailer by a MTVR vehicle, a vehicle currently used by the Marine Corps in Hawai‘i. The second subsystem is the Power Equipment Group (PEG), which provides power to the entire system via a generator mounted on the same MTVR. The third and final subsystem is the Communications Equipment Group (CEG), which provides the ability to communicate and control the radar. The CEG is mounted on a HMMWV, another vehicle currently used by the Marine Corps in Hawai‘i. This self-monitoring radar, which operates within Federal Communications Commission (FCC) limits and would not require additional FCC spectrum approval, automatically turns off to avoid harming personnel or the environment if the system exceeds preprogrammed parameters.
- Training. G/ATOR is designed to be flexible to support a variety of different missions. The G/ATOR’s expeditionary design enables Marines to transport it using fewer personnel and vehicles and set it up faster and more efficiently than the legacy systems it replaces. Typical training would involve the radar crew practicing system physical setup, including lowering the legs, applying power, and raising and spinning the main antenna array without emitting radio waves. If training requires, the system can be energized to provide surveillance of airspace; however, most of the training is accomplished without electromagnetic emissions.



Photo 5: G/ATOR System

2.1.2 Facilities

The proposed action also upgrades, renovates, and constructs new administrative, armory, and operational support facilities at MCB Hawaii Kaneohe Bay (see Figures 2-1 and 2-2 later in this chapter). None of the facilities proposed for renovation, modernization, or demolition under the preferred alternative are listed or eligible for listing in the National Register of Historic Places (NRHP). All proposed construction would occur on previously developed, paved, or landscaped areas. Water, sewer, and electrical utilities would be improved, as necessary, within the proposed construction footprints. All new

facilities would be constructed with Low Impact Development (LID) elements and appropriate BMPs to maintain stormwater discharges to pre-development hydrologic conditions. Ordnance storage and use at MCB Hawaii Kaneohe Bay for ground forces training would not change as a result of the proposed action, and no ordnance storage would occur at any of the facilities on the installation. A summary of key facility components is described below:

1. 3d Marine Littoral Regiment (MLR) Armory Expansion. This project would expand and upgrade an existing armory, Building 4053 (B4053), to provide additional weapons storage, maintenance areas, and a weapons cleaning area.
2. 1st Low-Altitude Air Defense (LAAD) Headquarters & Service (H&S) Battery Compound. This project would consolidate existing MCB Hawaii Kaneohe Bay functions by constructing an operational compound consisting of a collocated communications maintenance shop, automotive shop, storage facilities, training space, Headquarters offices, expansion of an existing armory, and an operational vehicle laydown area with overhead vehicle covers.
3. NMESIS Facility. This project would demolish facilities at an existing compound previously used for storing and maintaining amphibious vehicles to construct a new operational NMESIS compound. The compound would consist of a controlled humidity warehouse, equipment maintenance shop, electronic communications infrastructure, automotive organizational shop, and JLTV parking areas.
4. Consolidated Secure Communications Facility. This project would consolidate, expand, and upgrade existing communications facilities on base through construction of a two story, consolidated secure communications building.
5. 3d Littoral Anti-Air Battalion (LAAB) Air Control Battery Compound. This project would consolidate, expand, and upgrade existing functions by constructing an operational compound. The two-story building would have a maintenance facility, Headquarters offices, secure communication facilities, a controlled humidity warehouse, and an open-walled, steel-framed equipment canopy.
6. Live-Virtual Constructive Training Environment Complex. This project would consolidate, expand, and upgrade existing training facilities on base through construction of a classroom, simulators, and operational trainers.
7. Consolidated Paraloft and Dive Shop and 3d Radio Battalion Boat Shop. This project would consolidate, expand, and upgrade existing facilities on base through construction of a paraloft facility with 120-foot drying tower and a boat/dive maintenance shop.
8. G/ATOR Climate Controlled Warehouse and Pad. This project would construct a climate-controlled warehouse on the west side of Mōkapu Road to store and maintain the G/ATOR radar. A wall surrounding an existing concrete pad in the Pyramid Rock area would be demolished, and the pad would be re-used for training. This project would also involve demolition of B1180 and re-paving the associated parking lot.

2.1.3 Training

2.1.3.1 Training with Modernized Equipment

NMESIS, MADIS, L-MADIS, and G/ATOR would be utilized at existing Marine Corps training areas on O‘ahu, and on non-Marine Corps ranges controlled by the Army and Navy within the state of Hawai‘i, as well as at overseas and Continental U.S. locations, in accordance with training schedules and emerging combatant commander employment requirements. The analysis in this document focuses on Marine Corps-controlled training areas on O‘ahu because Marine Corps training activity on other Service ranges is addressed in their range-specific documents and would not increase training activity tempo or impose new or greater environmental impacts on those training ranges.

Given the advancement of technology and modernization of equipment, high live-fire costs, and the ability to achieve certain levels or sequences of training using simulators, a large portion of the field training conducted on O‘ahu with the modernized equipment will involve virtual or “digital” non-live-fire training without the expenditure of munitions. Training on these new systems will consist of maneuvering on existing ranges and range areas. Because these systems would replace and upgrade legacy equipment, the operational employment of the NMESIS, MADIS, L-MADIS, and G/ATOR would be similar to the tactics employed by legacy equipment on existing ranges and range areas. Established vehicle paths and approved areas would be used to set up and employ the equipment within the ranges; no new or expanded training areas are proposed in this action. Units training with the NMESIS would engage in setup and employment tactics similar to those used by current cannon batteries, with the important distinction that the proposed NMESIS units would not engage in live fire. MADIS and L-MADIS systems would be employed similar to current anti-aircraft systems utilizing light tactical vehicles in maneuvering, targeting, and simulated firing on existing ranges and range areas and within established vehicle paths and approved maneuver areas. The G/ATOR would set up and be employed in areas used by legacy radar and communications systems.

As discussed in Section 2.1.1, *Equipment*, the NMESIS and MADIS are mounted on JLTVs, which first began production in 2016 and entered the Marine Corps inventory in 2019. The JLTV is smaller and lighter than the legacy MTRV and both vehicles are currently used on O‘ahu ranges. The L-MADIS system is mounted on a ULTV, which is similar to a commercial off-road utility vehicle, and is smaller and lighter than the UTV currently used on O‘ahu ranges. The L-MADIS system would operate in a similar manner to the existing anti-aircraft training previously conducted by equipment mounted on the Marine Corps’ existing UTV. While the G/ATOR radar is a new piece of equipment, it would be mounted and towed on vehicles currently used in training on O‘ahu as described in Section 2.1.1.3.

Access to non-Marine Corps ranges in Hawai‘i occurs through prior coordination and permission from Army and Navy range management officials, who give priority for scheduling and training to their Service units. For this reason, and because the Marine Corps cannot unilaterally propose an increase in training or train inconsistent with approvals from other Services on these non-Marine Corps ranges, this EA addresses only environmental impacts on Marine Corps-controlled installations. This document assumes that training on non-Marine Corps ranges would remain consistent with historical use rates and within the scope of environmental impacts discussed in other Service environmental analyses for their ranges.

The type of training and associated activities conducted with modernized equipment would be similar to legacy training historically conducted by Marine Corps ground forces at training areas in Hawai‘i. With the need to have smaller, low signature, mobile forces, modernized equipment has been designed to meet evolving EABO concepts. Current ground-based training involves vehicles and personnel traveling

from MCB Hawaii Kaneohe Bay to a training location within existing training areas, using established vehicle paths and/or approved areas to move from one location to another, setting up the equipment in a particular location, operating the equipment in that area, and then demobilizing and moving either to another location within the training area or back to MCB Hawaii Kaneohe Bay. In some cases, the personnel would camp overnight at the location as part of the training. Current training adheres to guidance identified in MCB Hawaii Order 1500.9C, *Standing Operating Procedures for Marine Corps Base Hawaii Ranges and Training Areas* (MCB Hawaii, 2021a). These training concepts would be similar for training with modernized equipment. Specific descriptions of proposed training with each modernized equipment type are summarized below.

NMESIS. Units training with the NMESIS would engage in setup and employment tactics similar to those used by current cannon batteries, with the important difference being the proposed NMESIS units would not engage in live fire on O‘ahu. A NMESIS training event consists of a five-vehicle section of JLTVs. Two vehicles, the leader vehicle, and a command-and-control vehicle, would drive to the training area, while the three JLTV launcher vehicles would be loaded on a flatbed tractor trailer and transported to the training area. Once at the training area, Marine Corps forces would travel to a location on the range, occupy notional firing positions, establish communications with other Marine Corps units operating in conjunction with them, and pass information and target data across legacy and approved communication data systems. This simulated target data would be relayed to NMESIS ground forces, who would then simulate firing at a simulated target (i.e., no actual firing of the weapon system would occur). NMESIS training participants would then break down the equipment and move to another location to repeat the process. Live-fire training with the NMESIS would not be conducted on O‘ahu.

MADIS. While a portion of MADIS training can be conducted virtually because it is a crew-operated system, training must occur on O‘ahu Marine Corps RTAs so Marines can practice crew coordination in their assigned seat. During field training, the two-vehicle MADIS system would accompany small contingents of Marines to establish a GBAD position. This would include the MADIS maneuvering to the site, covering and concealing the equipment, communicating with adjacent units and higher headquarters, acquiring targets using radar, “digitally firing” upon a simulated target, breaking down the equipment, moving to another location, and repeating the process.

L-MADIS. L-MADIS systems would be employed similar to current UTV-mounted systems in maneuver, practicing surveillance, and setting up a defense. Field training would consist of the L-MADIS two-vehicle system accompanying small contingents of Marines to establish a GBAD position. Training would mimic the MADIS training described above, but on a smaller scale, to include maneuvering to the site, covering and concealing the equipment, communicating with adjacent units and higher headquarters, acquiring targets, breaking down the equipment, moving to another location, and repeating the process.

G/ATOR. The G/ATOR would replace a family of radars currently in use on O‘ahu and operate within existing frequencies, similar to those used by civilian and military radars on the island. Training at MCB Hawaii Kaneohe Bay would occur at two locations: a former radar site near Pyramid Rock and a former Sensor Compound on the east side of the base. Both locations are the current and former sites for the operation of radars the G/ATOR system is replacing. Typical training would involve the radar being towed to a training area. The radar crew would then practice system physical setup, including lowering the legs, applying power, then raising and spinning the main antenna array without emitting radio waves. If training requires, the system can be energized to provide surveillance of airspace. As noted earlier, if energized, the system would be operating within approved FCC frequency limits and can

automatically shut down if exceeding specified limits. However, most of the training would be accomplished without emissions.

2.1.3.2 Training Locations

NMESIS, MADIS, L-MADIS, and G/ATOR would be utilized on all existing Marine Corps training areas on O‘ahu, and on non-Marine Corps ranges controlled by the Army and Navy within the state of Hawai‘i. As noted earlier, Marine Corps training on Army and Navy ranges is limited to what is allowed through prior coordination and permission from the individual range managers. Any training on other Service ranges must conform to their individual range rules and their corresponding authorizations. As such, Marine Corps training with the modernized equipment would only occur where already specifically permitted by the Army and Navy. Consequently, this EA only analyzes the impacts of training with the modernized equipment on Marine Corps-controlled training areas on O‘ahu.

The Marine Corps currently conducts ground-based training at Marine Corps training areas at MCB Hawaii Kaneohe Bay, MCTAB, and Pu‘uloa RTF. MCB Hawaii Order 1500.9C, *Standing Operating Procedures for Marine Corps Base Hawaii Ranges and Training Areas*, details restrictions, avoidance areas, and training processes to protect sensitive natural and cultural resources on Marine Corps ranges. Potential impacts to biological and cultural resources would be further minimized by adhering to procedures established per the MCB Hawaii Integrated Natural Resources Management Plan (INRMP) and the Integrated Cultural Resources Management Plan (ICRMP). MCB Hawaii Order 1500.9C. Chapter 2 provides specifications for environmental coordination, identification of environmental constraints, and identification of specific off-limit areas and prohibited activities. Specific elements relating to resources contained in this instruction include:

- Specifying how to manage and report fuel spills or hazardous materials incidents.
- Coordinating with the base Environmental Compliance and Protection Division (ECPD).
- Avoiding damage to beach foliage, trees, and shrubbery by transiting only on existing roadways and trails.
- Limiting digging and other ground disturbance to 6 inches below the existing surface except in previously approved areas.
- Parking in authorized areas.
- Avoiding the following activities except where previously approved:
 - Disposing of trash, explosive material, or hazardous materials/waste.
 - Any release of oil, fuel, or hazardous materials onto the ground or into the water.
 - Removal or intentional destruction of plants, trees, brush, or other vegetation.
 - Killing, injuring, or harassing wildlife.
 - Removal or intentional destruction of archaeological materials or archaeological sites.
 - Use of detergents or chemicals for cleaning/maintaining vehicles and equipment.
 - Hunting without MCB Hawaii permission.
 - Ground disturbance within the Pyramid Rock Training Area Military Operations on Urbanized Terrain (MOUT) (i.e., within the Mōkapu Burial Area [MBA]).
 - Use of live ordnance without MCB Hawaii approval.
- Avoiding off-limit areas:

- Wetlands at MCB Hawaii Kaneohe Bay.
- Areas of historic significance at MCB Hawaii Kaneohe Bay.
- Waimānalo Stream.
- State of Hawai'i and private property.

Marine Corps Training Areas on O'ahu

MCB Hawaii Kaneohe Bay. MCB Hawaii Kaneohe Bay (see Figure 1-2) is located on the windward side of O'ahu. The installation covers the entirety of the Mōkapu Peninsula, which separates Kāne'ōhe Bay from Kailua Bay. MCB Hawaii Kaneohe Bay ranges shown in Figure 1-3 support platoon and smaller unit level live fire and maneuver training. Types of training include vehicle maneuver; foot patrols; obstacle course, gas chamber, driving simulator and virtual small arms training; MOUT, fast rope and rappelling training; amphibious training; and limited live-fire training. There are two non-live-fire amphibious beaches (Pyramid Rock and Fort Hase), a live-fire shoot house, an Infantry Immersion trainer, a helicopter/MV-22 landing zone (LZ), a non-live-fire training area, and an underwater egress trainer, all supporting pre-deployment training. The Main Site training area has a total of 15 ranges located in the Ulupa'u Crater that support individual and small unit live-fire training. Training occurs year-round throughout the installation.

Under the proposed action, existing training would continue on MCB Hawaii Kaneohe Bay pursuant to established range protocols, but now using modernized equipment; for example, JLTVs instead of 7-ton trucks, NMESIS non-live-fire batteries versus cannon live fire, and training with smaller, more dispersed forces.

MCTAB. MCTAB (see Figure 1-4) encompasses 1,072 acres located approximately 8 miles south of MCB Hawaii Kaneohe Bay and adjacent to Bellows Air Force Station, between the communities of Kailua and Waimānalo. MCTAB is the primary Marine Corps training area on O'ahu and provides maneuvering space for training including amphibious, air and ground maneuver training, Land Navigation training, MOUT training, Barrier Obstacle Training, vehicle operator's confidence training, and Search and Rescue training. MCTAB supports company and below unit sized level non-live-fire amphibious, helicopter, and urban training, and motorized exercises in conjunction with troop land maneuver training. No live-fire ranges are located at MCTAB; however, for realism, simulation pyrotechnics are used during Infantry Immersion Training within the urban training facilities. Each weekend, Training Area 1 is closed to military activities from noon Friday until 8 a.m. Monday to allow recreational use of the beach.

Pu'uloa RTF. Pu'uloa RTF (see Figure 1-5) is a 162-acre training area on the eastern edge of 'Ewa Beach and just west of the Pearl Harbor entrance channel. Civilian housing borders its east and west sides. Pu'uloa RTF supports live-fire training for small arms training, qualification, and requalification. It is used by the Marine Corps and other DoD services and local law enforcement agencies.

Non-Marine Corps Controlled Training Areas

Marine Corps ground forces in Hawai'i also train at the Army and Navy training areas listed below (see Figure 1-6). Marine Corps training on Army- and Navy-controlled ranges occurs through scheduling requests to the range managers. As described in Section 2.1.3, *Training*, the type of proposed training that would occur with modernized Marine Corps equipment on these ranges is similar to the type of training currently and historically conducted by Marine Corps ground forces in Hawai'i at these ranges using legacy equipment. The preferred alternative would not increase the frequency, duration, or impact of Marine Corps training activities over those currently authorized on these ranges, and, in some

cases (such as the substitution of NMESIS for legacy cannon batteries), this modernized training would reduce the environmental impact of Marine Corps activity on those ranges. Training at non-Marine Corps ranges under the proposed action would comply with current operational, environmental, and cultural restrictions at these ranges. Because the proposed action does not involve an increase in the type or frequency of Marine Corps training on non-Marine Corps ranges, and these activities are analyzed in environmental documentation covering such ranges, training on non-Marine Corps ranges is described below but not analyzed in this document.

- Schofield Barracks Military Reservation. Schofield Barracks Military Reservation consists of a spectrum of ranges covering individual training to platoon level attack, small arms, mortar, and artillery training. Schofield provides the Marine Corps with the only training area on O‘ahu capable of supporting 81mm mortar live training. Marine Corps training at Schofield Barracks includes unit live-fire maneuver, small arms live-fire up to .50 caliber, and grenade training, as well as company, troop, and battery level field training.
- Kahuku Training Area. Kahuku Training Area is the largest maneuver area on O‘ahu used by the Army, Marine Corps, Reserves, and National Guard. Marine Corps training at Kahuku Training Area largely focuses on non-live-fire sensor and maneuver training, helicopter training, and establishment of expeditionary bases.
- Kawailoa-Poamoho Training Area. Kawailoa-Poamoho Training Area is state-owned land used for non-live-fire maneuver training and low-altitude helicopter flight training.
- Dillingham Military Reservation. Dillingham Military Reservation supports platoon- and squad-sized maneuvers. Marine training at Dillingham is similar to Kahuku Training Area and also supports C-130 and helicopter troop insert and egress training.
- Makua Military Reservation. Makua Military Reservation is used for air assault training, ground training, helicopter, and UAS training. Marine Corps training at Makua focuses on UAS training and non-live-fire sensor training, as well as establishing expeditionary bases.
- Pohakuloa Training Area. Pohakuloa Training Area supports company-size live-fire training, anti-tank weapons employment, helicopter aerial gunnery, artillery, UAS, and close air support training, and is the only set of ranges in the Hawaiian Islands capable of supporting combined arms training. Marine Corps training at Pohakuloa Training Area focuses on higher level and more complex training, such as combined arms training, which cannot be accomplished anywhere else in Hawai‘i.
- Pacific Missile Range Facility. Pacific Missile Range Facility is primarily used by Marine Corps forces during large scale exercises such as Rim of the Pacific (RIMPAC).

Training Events off Hawai‘i

In addition to these ranges, Marine Corps forces travel to ranges located within the Continental U.S. and overseas for DoD and joint training exercises such as RIMPAC. As with non-Marine Corps controlled training areas on Hawai‘i, the proposed action does not involve increasing the frequency or changing the type of these off-island training events which are analyzed in site-specific environmental documentation and are therefore not analyzed in this document.

2.2 Alternatives

NEPA requires agencies to consider reasonable alternatives to the proposed action. The identification, consideration, and analysis of alternatives are important aspects of the NEPA process and contribute to

the goal of informed decisionmaking. The range of alternatives includes reasonable alternatives which meet the purpose and need of the proposed action, as well as other alternatives that were considered but eliminated from detailed analysis. A No-Action Alternative must also be included as a baseline for analysis.

2.2.1 Alternatives Considered but not Carried Forward for Analysis

The Marine Corps considered and eliminated from detailed analysis two training alternatives because they did not meet the purpose and need for the proposed action.

- Solely Virtual Training. The Marine Corps currently employs a large variety of training methods including classroom training and simulations, virtual training (e.g., positioning equipment and doing virtual firing without expending munitions), and real-world maneuver and live-fire training. Virtual training is an important supplement to real-world training experience but cannot replace the experience of physically operating the equipment in a live training environment. Physical use of the equipment develops familiarity and proficiency with the equipment and with the order of operations necessary to properly employ the equipment. The agile and responsive nature of modern training concepts requires that Marines train in the field to practice resolving and adapting to changing conditions. Relying entirely on virtual and classroom training would not meet the purpose and need of this action as it would not allow Marine Corps ground forces in Hawai'i to meet Marine Corps requirements set forth in Title 10 U.S.C. Section 8063. Therefore, this alternative is not carried forward for analysis.
- Training Outside Hawai'i. Marine Corps ground forces in Hawai'i currently train on Army and Navy ranges on and off O'ahu, as well as at Continental U.S. and overseas locations. Increasing "off-island" training away from O'ahu ranges was considered and dismissed as a viable action alternative. In addition to the cost and logistical burdens associated with traveling off-island for training, increased training at Army and Navy training areas, even within the Hawaiian Islands, is infeasible because the Marine Corps does not have assured access to these ranges, resulting in decreased and unpredictable training opportunities. Under existing conditions, Marine Corps training can be scheduled only when other Service training is not underway on the range or when there are large-scale training events. Reliance on large-scale exercises such as RIMPAC or overseas joint training events would result in an unacceptable level of certainty as to when and whether units could meet their training requirements. This uncertainty would negatively impact unit readiness inconsistent with the purpose and need of the proposed action.

2.2.2 Alternatives Carried Forward for Analysis

The proposed action includes equipment modernization, facilities improvement, and training necessary to enable Marine Corps ground forces in Hawai'i to meet their Title 10 requirements. This equipment and training are necessary to support the emerging joint, naval, and Marine Corps operating concepts. As such, there is no alternative equipment or training for that equipment that would enable Marine Corps ground forces in Hawai'i to meet the purpose and need. Therefore, alternatives analysis for facilities and for training tempo is presented in the respective subsections below.

2.2.2.1 Facilities

Figure 2-1 shows proposed facilities preferred locations, and Figure 2-2 shows proposed facilities project footprints. Proposed support facilities must be located at MCB Hawaii Kaneohe Bay where the Marine Corps ground forces are physically located. Facilities planning considered existing facilities use, future growth at the installation, and mission flexibility, as well as minimization of environmental and cultural resource impacts. As such, the proposed infrastructure was developed to align with existing uses and reduce, to the greatest extent possible, environmental and cultural impacts.

1. 3d MLR Armory Expansion. The newly reorganized 3d MLR, which is the main component of the modernized Hawai'i-based Marine Corps ground forces, as well its subordinate units and existing Hawai'i-based ground forces supporting the III Marine Expeditionary Force, requires an expanded armory, which is a specialized building with stringent physical security requirements for weapons storage. Weapons systems would be stored and maintained at the armory, but no ordnance would be handled or stored at this location. Armories must be located at MCB Hawaii Kaneohe Bay for ease of access to small arms and crew-served weapons used by Hawai'i-based Marine Corps ground forces. The following alternatives were considered:
 - a. Preferred alternative – Renovate and expand an existing armory (B4053). Existing spaces within B4053 would be renovated to better configure weapons storage and issue. Expansion of B4053 would allow for consolidated weapons storage as well as a weapons maintenance shop and weapons cleaning area. Ordnance associated with weapons stored in the armory would be kept in existing weapons magazines onboard MCB Hawaii Kaneohe Bay. This alternative would lead to more efficient weapons storage, management, and maintenance for Hawai'i-based Marine Corps ground forces.
 - b. Use of existing armories – Under this alternative, units would use B4053 in its current condition as well as existing and additional modular armories. This alternative is not preferred because the existing capacity in B4053 is limited, requiring the displacement of weapons storage to multiple facilities. This leads to inefficient management of the weapons and their maintenance.
2. 1st LAAD H&S Battery Compound. The 1st LAAD H&S Battery requires facilities to meet its new anti-air mission, including administrative, maintenance, and vehicle storage/staging areas. The following alternatives were considered:
 - a. Preferred alternative – This alternative involves construction of a compound near Building 4052, located in the east portion of the base on 3rd Street, adjacent to the drainage canal. This would involve demolition of seven small buildings, a parking lot, and a ball field, and the construction of a communications maintenance shop and launcher/projectile shop building, a two-story automotive organization shop with maintenance bays and administrative spaces, a storage facility, a battery headquarters and training facility, a vehicle laydown area, and an expansion of an existing armory. As with the armory for the 3d MLR, ordnance associated with weapons stored in this armory would be kept in existing ordnance magazines at MCB Hawaii Kaneohe Bay.
 - b. Reuse of existing space/facilities – This alternative involves construction of a compound near Building 6468 and use of modular armories. This alternative is not preferred because the space surrounding Building 6468 is limited, resulting in a more constrained footprint and operational inefficiency. Finally, as with the prior facility project, the use of modular armories leads to inefficient weapons storage and maintenance.

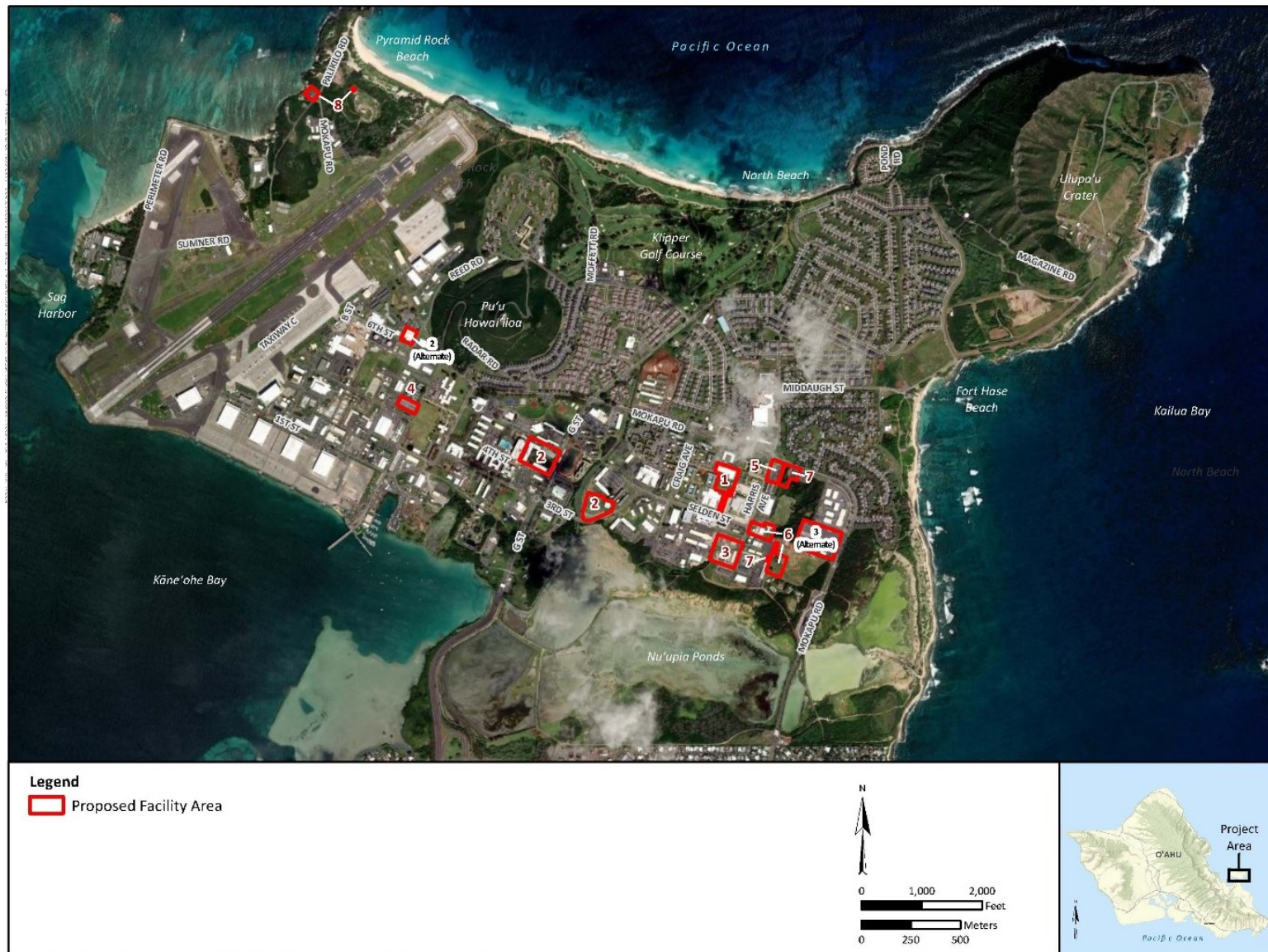


Figure 2-1 Proposed Facilities Preferred Locations, MCB Hawaii Kaneohe Bay

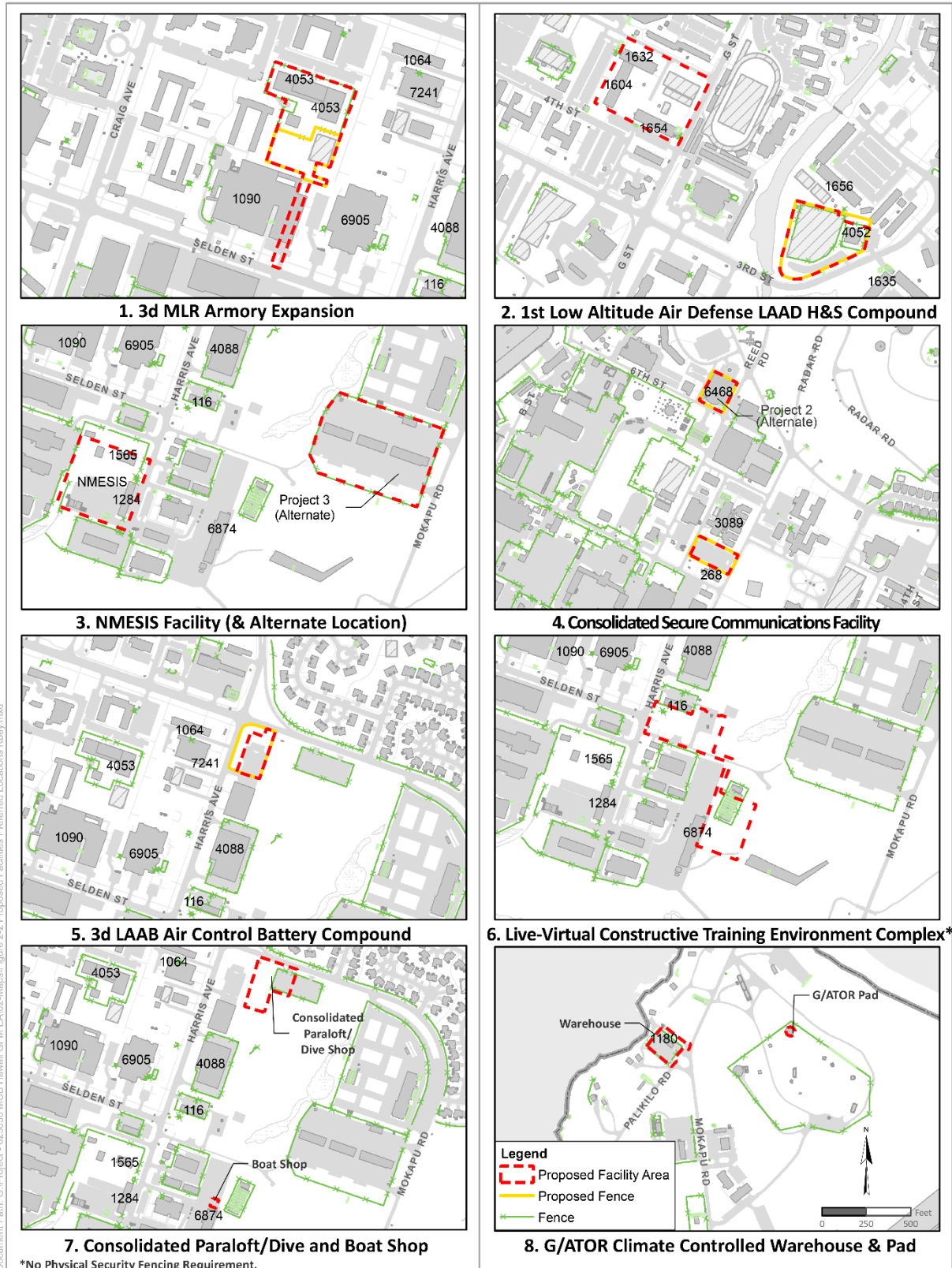


Figure 2-2 Proposed Facilities Project Footprints

3. NMESIS Facility. Facilities, including storage, maintenance, communications, and vehicle storage/staging facilities, are necessary to support this weapons system. The following alternatives were considered:
 - a. Preferred alternative – This alternative involves construction of a NMESIS facility compound in the former Amphibious Assault Vehicle (AAV) Compound located on the east portion of the installation at the corner of Selden Street and Harris Avenue. This would involve the demolition of five existing, small AAV support facilities, temporary fabricated buildings, and wash pads; the construction of a launcher/projector maintenance shop, controlled humidity warehouse for NMESIS weapons system storage, an administrative support area in the maintenance area; a two-story electronic/communications maintenance shop; and an automotive organizational shop with an administrative support area for the NMESIS JLTV vehicles. No ordnance for the NMESIS weapons system would be stored in this facility compound.
 - b. Construction of a NMESIS facility compound in the former 1/12 Gun Park – This alternative would involve the demolition of various small buildings in the 1/12 Gun Park; renovation of Buildings 5000 and 5001 in the 1/12 Gun Park for a controlled humidity warehouse and an electronics/communications maintenance shop; renovation of Building 5011 for the launcher/projector maintenance shop; and construction of a new automotive organizational shop. This alternative is not preferred because there is limited clear space between buildings in the 1/12 Gun Park to allow the expansion required to meet NMESIS facility requirements.
4. Consolidated Secure Communications Facility. Marine Corps ground forces in Hawai'i using modernized weapons systems and sensors require greater use of secured communications, information, and intelligence capabilities and facilities to make full use of their capabilities. The following alternatives were considered to increase this capability:
 - a. Preferred alternative – This alternative involves construction of a consolidated secure communication facility located near the 3d MLR Headquarters in the central portion of the installation off D Street, between existing buildings 3089 and 268. This would involve the construction of a two-story building to house secure communications spaces, unclassified administrative spaces, and training areas.
 - b. Use of existing secure communications facilities – This alternative would involve use of existing buildings and mobile structures located throughout the base for secure communications purposes. This alternative is not preferred because existing secure communications spaces for the 3d MLR and its subordinate units provide limited workstations to support the full operational capability of the 3d MLR and its subordinate units. Further, these facilities are currently distributed throughout the installation, impeding or precluding efficient integration and communication between MLR elements to allow effective use and training on the modernized weapons systems.
5. 3d LAAB Air Control Battery Compound. This project would involve construction of the Battery Headquarters, Maintenance Shop, and a Vehicle Staging Area. This would be used for administrative functions and for storage and maintenance. The following alternatives were considered:
 - a. Preferred alternative – Construct a Marine Air Control Battery building in the ground support area of MCB Hawaii Kaneohe Bay. This would involve new construction, with the Marine Air unit operations building for administration and classified communications material storage constructed near the existing 3d LAAB Headquarters building, in the ground support area of

MCB Hawaii Kaneohe Bay. Consolidating the functions of the LAAB Air Control Battery into one location would improve efficiency of the MLR.

- b. Reuse of existing space/facilities – This alternative would use the former 1/12 Sensor Compound at Building 1551 which functions as the current Air Control Battery Compound. This alternative is not preferred because the building is located within the 100-year floodplain, straddling Federal Emergency Management Agency (FEMA) Flood Zones VE and AE and within the Tsunami Evacuation Zone. The space is naturally ventilated, with no climate control equipment or wall insulation, and the facility is located within 500 feet of the ocean, with prior flooding events having occurred at the facility during major storms.
6. Live-Virtual Constructive Training Environment Complex. Hawai'i-based ground forces require access to virtual training facilities to meet expanded training requirements and to ensure proper use of modernized weapons and sensor systems when deployed to the field. The following alternatives were considered:
 - a. Preferred alternative – Construct a new one-story consolidated virtual training facility located in the ground support area at MCB Hawaii Kaneohe Bay that will have virtual trainers for various infantry, vehicle, and tactical training functions; storage and maintenance areas for virtual training equipment; and office space, classrooms, and an auditorium.
 - b. Use of existing facilities – This alternative would continue to use existing virtual training facilities on base. This alternative is not preferred because existing virtual training facilities are scattered around the installation and typically housed in trailers. This leads to inefficient training that reduces instructor effectiveness and adds a logistical burden to deploying units. Further, existing facilities are insufficient to meet the expanded training needs of modernized Hawai'i-based ground forces.
7. Consolidated Paraloft/Dive Shop and Boat Shop. Modernized parachute, diving, and boating facilities are required to improve Hawai'i-based ground forces efficiency and effectiveness. The following alternatives were considered:
 - a. Preferred alternative – Construct a consolidated paraloft/dive shop and boat shop in the ground support area of MCB Hawaii Kaneohe Bay, behind Parking Structure 7245 (the current paraloft/dive shop) and adjacent to Building 6874 (boat shop). The paraloft portion of the paraloft/dive shop facility would be used for packaging, storage, and cleaning of parachutes. The dive shop portion would be used for the maintenance of diving equipment. The boat shop would require the construction of a new facility to provide maintenance to small boats and would be located in the existing 3d Radio Battalion Auto Organization shop complex.
 - b. Use of existing facilities – This would involve use of existing facilities for the dive shop, boat shop, and paraloft. This alternative is not preferred because it does not fully support operational capabilities. Use of existing facilities would also result in maintenance activities conducted at multiple locations, creating operational and logistics inefficiencies.
8. G/ATOR Climate Controlled Warehouse and Pad. Facilities, including storage, maintenance, communications, and vehicle storage/staging facilities, are necessary to support this equipment. The following alternative was considered:
 - a. The controlled humidity warehouse for the G/ATOR radar would be located in a compound that currently houses Building 1180 in the Pyramid Rock area of MCB Hawaii Kaneohe Bay. Building

1180 would be demolished, allowing construction of the controlled humidity warehouse in this area. This would enable the G/ATOR radar to be stored and maintained close to the area where it will be employed for training, which is on high ground with a pad located adjacent to the Pyramid Rock MOUT site. To minimize potential ground disturbance in areas of the Pyramid Rock Training Area (which is in the MBA), the Marine Corps revised the siting concept to use an existing concrete pad rather than a new one, avoid any utilities trenching to the pad, and locate the G/ATOR Climate Controlled Warehouse to the existing Building 1180 site, outside of the MBA.

- b. No other alternatives meeting the purpose and need were identified for this facility.

2.2.2.2 Training

The Marine Corps has identified alternatives to the level of training with modernized equipment on O'ahu. To develop these training alternatives, the Marine Corps reviewed historic training activity with legacy equipment on O'ahu at MCB Hawaii Kaneohe Bay, MCTAB, and Pu'uloa RTF to develop a baseline of training frequency on the three Marine Corps ranges on O'ahu¹. As previously noted, the number of training events that would occur at non-Marine Corps ranges would remain at the same level as with legacy equipment, and, therefore, were not included in the development of alternatives. Averaging the last three non-COVID-impacted training years results in baseline level of 1,449 training events per year for all Marine Corps training areas (Table 2-1).

Table 2-1 Baseline Marine Corps Ground Equipment Training Events at Marine Corps Training Areas on O'ahu

<i>Location</i>	<i>Baseline¹</i>
Marine Corps Training Areas	
MCB Hawaii Kaneohe Bay	649
MCTAB	624
Pu'uloa RTF	176
Total	1,449

Notes: ¹Baseline tempo is average of pre-COVID annual tempo (2018–2019).

Legend: MCB = Marine Corps Base; MCTAB = Marine Corps Training Area Bellows; RTC = Range Training Complex; RTF = Range Training Facility.

With this baseline of training activity, two potential action alternatives were identified:

- **Alternative 1.** This alternative proposes an annual average of approximately 1,500 Marine Corps ground equipment training events on Marine Corps ranges on O'ahu (Table 2-2), consistent with historic Marine Corps range utilization on O'ahu using legacy systems.

¹ The Marine Corps referenced 2018, 2019, and 2022 training activity to generate a representative average of needed training; 2020 and 2021 were omitted due to the significant constraints the global pandemic placed on military training. Marine Corps ground training at the three Marine Corps ranges on O'ahu shown in Table 2-1 represents only a portion of overall training that occurs at these locations.

- **Alternative 2.** This alternative proposes an annual average of approximately 1,800 Marine Corps ground equipment training events on Marine Corps ranges on O‘ahu (Table 2-2), representing an increase of approximately 300 events over Alternative 1 (see Table 2-2).²

2.2.3 Alternative 1 (Preferred Alternative)

Table 2-2 presents existing training at Marine Corps training areas with legacy equipment compared to proposed training Alternatives 1 and 2 involving modernized equipment. Table 2-3 provides an estimate of vehicle miles traveled to execute existing and proposed training. Alternative 1 would include the same modernized equipment, type of training, and facilities modernizations described in Section 2.2.2.1. Alternative 1 is the preferred alternative for training tempo.

Table 2-2 Existing and Proposed Marine Corps Ground Equipment Training Events at Marine Corps Training Areas

<i>Location</i>	<i>Baseline¹</i>	<i>Alternative 1²</i>	<i>Change</i>	<i>Alternative 2³</i>	<i>Change</i>
MCB Hawaii Kaneohe Bay (RTC + on base)	649	649	0	779	130
MCTAB	624	624	0	749	125
Pu‘uloa RTF	176	176	0	211	35
Grand Totals	1,449	1,449	0	1,739	290

Notes: ¹Baseline tempo is average of pre-COVID annual tempo (2018–2019).

²Alternative 1 tempo is described in Section 2.2.3.

³Alternative 2 tempo is described in Section 2.2.4.

Legend: MCB = Marine Corps Base; MCTAB = Marine Corps Training Area Bellows; RTC = Range Training Complex; RTF = Range Training Facility.

Table 2-3 Existing and Proposed Annual Vehicle Trips

<i>Location</i>	<i>Baseline¹</i>	<i>Alternative 1²</i>	<i>Change</i>	<i>Alternative 2³</i>	<i>Change</i>
Vehicles Off Base					
Annual	4,207	4,207	0	5,048	841
Monthly	351	351	0	421	70
Daily	12	12	0	14	2
Trips Off Base					
Annual	800	800	0	960	160
Monthly	67	67	0	80	13
Daily	2	2	0	3	1

Notes: ¹Baseline tempo is average of pre-COVID annual tempo (2018–2019).

²Alternative 1 is described in Section 2.2.3.

³Alternative 2 is described in Section 2.2.4.

2.2.4 Alternative 2

Alternative 2 would include the same modernized equipment, type of training, and facilities modernizations described in Section 2.1, but training tempo would increase over baseline levels for ground equipment training with such modernized equipment. This alternative accommodates a slight increase in training tempo in the event that U.S. or overseas training is not available. As a result, Marine

² During the comment period, some commenters objected to a “20% expansion of training days” in activity at Pu‘uloa range training facility. The proposed action would not change small arms training at Pu‘uloa or any other small unit or individual skills training that currently occurs on O‘ahu.

Corps training areas would see increased operational activity resulting in more frequent training evolutions.

2.2.5 No-Action Alternative

Under the No-Action Alternative, the proposed action would not occur. Training activities would be limited to the existing legacy equipment and associated training levels and facilities for Marine Corps ground forces in Hawai'i. The No-Action Alternative does not meet the purpose and need for the proposed action because it would not enable the restructuring of Marine Corps ground forces in Hawai'i to meet its Title 10 responsibilities to support emerging joint, naval, and Marine Corps operating concepts. However, as required by NEPA, the No-Action Alternative is carried forward for analysis in this document.

2.2.6 Best Management Practices

BMPs are policies, practices, and measures the Marine Corps would implement as part of the proposed action to proactively avoid or minimize potential environmental impacts. They are distinguished from potential mitigation measures because BMPs are either specific requirements applicable to the proposed action or established regularly occurring practices routinely implemented for Marine Corps projects. In other words, the BMPs identified in this document are inherently part of the proposed action and are not proposed mitigation measures specifically identified as part of this NEPA environmental review process. Table 2-4 lists BMPs that would be implemented as part of the proposed action. Proposed mitigation measures are discussed separately in Chapter 3.

Table 2-4 Proposed BMPs

<i>BMP</i>	<i>Impacts Reduced/Avoided</i>	<i>Description</i>	<i>Applicability</i>
Stormwater Management	Minimize pollutants in stormwater flows	BMPs used near or on the runways are filter socks around and filter fabric inside the storm drains to prevent pollutants from getting into the storm sewer system. Any sediment stockpiled on the ramps would require filter socks and be frequently watered down using a water truck for dust control. At contractor trailer/staging areas, BMPs include stabilized construction entrance and exits, boundary fencing with fabric, filter socks around perimeter, and/or silt fencing.	Construction
Stormwater LID Techniques	Minimize pollutants in stormwater flows	LID techniques such as bio-retention, vegetated swales, and/or vegetated filter strips would be used as required for ongoing management and treatment of stormwater.	Training
Stormwater Permit Requirements	Minimize pollutants in stormwater flows	Compliance with the requirements of the NPDES permit for the discharge of stormwater associated with construction activity, including a SWPPP.	Construction
Stormwater Detention Basin	Minimize attraction of birds	The detention basin would be covered in a manner to avoid attracting birds.	Construction

<i>BMP</i>	<i>Impacts Reduced/Avoided</i>	<i>Description</i>	<i>Applicability</i>
Stormwater Diversion to Wetlands	Enhance water flow to wetlands	To the extent possible, incorporate diversion features that increase flow of stormwater to nearby wetlands, in coordination with MCB Hawaii ECPD Natural Resources staff.	Construction, Training
Cultural Resources	Avoid unintentional adverse impacts to unknown subsurface cultural resources, including historic properties that may be eligible for the NRHP	Digging and other ground disturbance is limited to 6 inches below the surface. No fighting holes, bunkers, or trenches may be dug unless approved by the ECPD, except in previously approved areas. Removal of sand from beaches or shoreline for any purpose (i.e., filling of sand bags, making sand tables, personal use, etc.) is strictly prohibited (MCB Hawaii Order 1500.9C).	Construction
Cultural Resources	Avoid intentional adverse impacts to known cultural resources including historic properties eligible for the NRHP	The following areas are off-limits for all training activities per MCB Hawaii Order 1500.9C: <ul style="list-style-type: none"> • MCB Hawaii Kaneohe Bay – areas of historical significance; removal or intentional destruction of archaeological materials or artifacts or the disturbance to any archaeological site; ground disturbance will not be permitted within or around the Pyramid Rock Training Area MOUT (within the MBA). 	Training
Pre-construction Surveys for Biological Resources	Minimize disturbance to sensitive species	Pre-construction surveys for special-status species with the potential to occur would be conducted daily by a qualified biologist to ensure no species are present at the project sites. A biological monitor would conduct nest surveys in the existing trees at each site and within 100 feet of the proposed project sites. Nest surveys would be repeated within 3 days of project initiation and after any subsequent delay of work of 3 or more days. If a nest or active brood is found: <ul style="list-style-type: none"> • MCB Hawaii Natural Resources would contact the USFWS within 48 hours for further guidance. • A 100-foot buffer would be established and maintained around all active nests and/or broods until they have fledged. No potentially disruptive activities or habitat alteration would occur within this buffer. • After hatching, a biological monitor would be onsite during construction until chicks have fledged. If a pueo is spotted on the ground during pre-construction surveys, a nest survey would commence within 200 meters of the observed pueo. If a nest is discovered, a 200-meter buffer would be erected to protect the nest.	Construction

<i>BMP</i>	<i>Impacts Reduced/Avoided</i>	<i>Description</i>	<i>Applicability</i>
Vegetation Trimming/Removal	Minimize disturbance to sensitive species	<p>Removal, pruning, or trimming of trees and vegetation during bird nesting and bat pupping seasons would be avoided.</p> <ul style="list-style-type: none"> To the maximum extent practicable, tree trimming activities would avoid the peak white tern egg-laying months (March and October) and nest surveys would be conducted prior to tree disturbance. If the tree scheduled for removal, pruning, or trimming is found to contain a nest, the tree would not be disturbed until the chicks have fledged. No pruning or trimming of trees and vegetation 15 feet or greater would be removed during the Hawaiian hoary bat pupping season (June 1–September 15). <p>If a bat is detected, tree trimming would not commence within 100 feet of the known roosting sites. If vegetation removal is proposed during the pupping season, consultation with USFWS is required.</p>	Construction
Natural Resources	Avoid intentional adverse impacts to natural resources	<p>The following areas are off-limits for all training activities per MCB Hawaii Order 1500.9C:</p> <ul style="list-style-type: none"> MCTAB – no training is allowed within or adjacent to Waimānalo Stream. This includes a 100-yard buffer zone around the mouth of the stream. If a unit wishes to cross the stream for any reason, it must be coordinated with the RCO. 	Training
Beach Training	Minimize disturbance to Hawaiian yellow- faced bee	<p>Neither military training nor the use of modernized equipment would occur in any identified habitat for bees.</p> <ul style="list-style-type: none"> No training would be conducted on North Beach at MCB Hawaii Kaneohe Bay where bees are found. On the Pyramid Rock shoreline at MCB Hawaii Kaneohe Bay, proposed training would not occur in areas that have been delineated and marked as bee habitat. <p>In areas where habitat has not been delineated yet, proposed training would not create new pathways through shoreline vegetation, and would only utilize existing pathways to and from the beach to minimize disturbance of bee habitat and protect the dune system.</p>	Training

<i>BMP</i>	<i>Impacts Reduced/Avoided</i>	<i>Description</i>	<i>Applicability</i>
Monitoring for Sea Turtles	Minimize disturbance to sea turtles	<p>Beaches within the project area would continue to be monitored or observed on a regular basis but vary in frequency depending on the location (e.g., once per week at MCB Hawaii Kaneohe Bay; approximately daily at Pu'uloa RTF; and variable at MCTAB).</p> <ul style="list-style-type: none"> • If a basking sea turtle is found within the project area, individuals would maintain a 50-foot distance and all equipment and larger training events would require units to maintain 150 feet from a turtle ashore. • If a sea turtle nest is discovered, a protective barrier with a warning sign, approximately 20 feet by 20 feet would be erected around the nest area. 	Construction, Training
Equipment Use Near Sea Turtle Habitat	Minimize disturbance to sea turtles	<p>Modernized military equipment would not be driven upon or staged in a static position on sand dunes but would be involved in training on beaches in accordance with BMPs identified in the MCB Hawaii INRMP (MCB Hawaii, 2023a), which include:</p> <ul style="list-style-type: none"> • Beaches and nearshore waters in the vicinity of military maneuvers (RIMPAC Exercise, motor vehicle training, amphibious landings) or large-scale recreation events would be surveyed at least 1 hour prior to the event and observed during the event. • If sea turtles are present, the event may be cancelled, or moved at least 150 feet away from the sea turtle. In the unlikely event a sea turtle comes ashore during an event, people and equipment would be required to move at least 150 feet away from the area and regular protection protocols would be followed. <p>All equipment would use established vehicle paths to move equipment to and from the beach to protect shoreline vegetation and dune systems.</p>	Construction, Training
Shoreline	Minimization disturbance to coastal species	<ul style="list-style-type: none"> • Any project-related debris, trash, or equipment from the beach or dune would be removed. • No project-related materials would be stockpiled in intertidal zone, reef flats, stream channels, sandy beach, or adjacent vegetated areas. • No fires. • No woody debris would be moved, altered, or collected. • Educational signs would be maintained to provide information on the presence and sensitivity of shoreline species. 	Construction, Training

<i>BMP</i>	<i>Impacts Reduced/Avoided</i>	<i>Description</i>	<i>Applicability</i>
Lighting	Bird/bat disorientation/fallout	<p>Night work would be minimized during proposed construction to the greatest extent possible. If night work occurs, the following measures would be implemented:</p> <ul style="list-style-type: none"> • Night lighting would be shielded, directed downward, use motion detectors or other automatic controls, and the lowest possible lumens. The necessary amount of exterior light would be determined for safety purposes. • Contractor will notify the MCB Hawaii Environmental Division in advance of any night work and would be briefed on wildlife concerns (e.g., seabird fallout) and minimization measures. • If a downed seabird is observed, contractors would contact the MCB Hawaii Environmental Division staff immediately to report the observation. • Limit use of lights for any training operations during the seabird fledging period (September – December), especially during new moon phases. <p>Exterior lighting would follow MCB Hawaii “Wildlife Friendly Lighting” standards (see below).</p>	Construction
Lighting	Bird/bat disorientation/fallout	Exterior lighting would follow MCB Hawaii “Wildlife Friendly Lighting” standards (MCB Hawaii, 2022a). When exterior lighting is required, all exterior lights for new construction, replacement of existing fixtures, and renovations would meet or exceed USFWS, NOAA, and/or IDA standards unless otherwise required by the military mission, per the MCB Hawaii INRMP (MCB Hawaii, 2023a).	Construction, Training
Lighting	Minimize attraction of birds	Limit use of lights during the seabird fledging period September–December, especially during new moon phases.	Training
Lighting	Minimize sea turtle disorientation	Any lights required at night would use long wavelength (greater than 560 nanometers and absent wavelengths below 560 nanometers) light sources such as amber, orange, or red LEDs without the use of filters, gels, or lenses. Short wavelength light sources, PC Ambers, RGBs, dual lighting boards, and color change options are not acceptable (MCB Hawaii, 2023a).	Construction, Training
Fencing	Minimize Hawaiian hoary bat entanglement in barbed wire fencing	The proposed fencing would minimize use of barbed wire.	Construction
Landscaping	Preferential planting of native plants	Include native plant vegetation restoration and landscape repair where possible for landscaping of new and renovated facilities.	Construction

<i>BMP</i>	<i>Impacts Reduced/Avoided</i>	<i>Description</i>	<i>Applicability</i>
Education	Minimize indirect effects to ESA-listed species from contractors, personnel, and dependents	All construction contractors and personnel would participate in MCB Hawaii's existing natural resources education program. The program would include, at a minimum, the following topics: (1) occurrence of natural resources (including ESA-listed species); (2) sensitivity of the natural resources to human activities; (3) legal protection for certain natural resources; (4) penalties for violations of federal law; (5) general ecology and wildlife activity patterns; (6) reporting requirements; (7) measures to protect natural resources; (8) personal measures that users can take to promote the conservation of natural resources; and (9) procedures and a point of contact for ESA-listed species observations.	Construction, Training

Notes: ARPA = Archaeological Resources Protection Act; ECPD = Environmental Compliance and Protection Division; ESA = Endangered Species Act; IDA = International Dark-Sky Association; INRMP = Integrated Natural Resources Management Plan; LED = light-emitting diode; LID = Low Impact Development; MCB = Marine Corps Base; MCTAB = Marine Corps Training Area Bellows; MOUT = Military Operations on Urbanized Terrain; NAGPRA = Native American Graves Protection and Repatriation Act; NHPA = National Historic Preservation Act; NOAA = National Oceanic and Atmospheric Administration; NPDES = National Pollutant Discharge Elimination System; NRHP = National Register of Historic Places; RCO = Range Control Officer; RIMPAC = Rim of the Pacific; RTC = Range Training Complex; SWPPP = Storm Water Pollution Prevention Plan; USFWS = United States Fish and Wildlife Service.

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3 Affected Environment and Environmental Consequences

This chapter presents a description of the existing environment and an analysis of the potential direct and indirect effects of Alternatives 1, 2, and the No-Action Alternative (cumulative effects are presented in Chapter 4). The affected environment is the construction footprint at MCB Hawaii Kaneohe Bay; the training areas at MCB Hawaii Kaneohe Bay, MCTAB, and Pu'uloa RTF; the roadways leading to/from Marine Corps training areas; and the immediately surrounding communities. The level of detail and analysis for each resource varies with the level of potential environmental impact.

"Significantly," as used in NEPA, requires considerations of both the degree of effects and the affected environment, the affected region, the affected interests, and the locality. Significance varies with the setting of a proposed action. For instance, in the case of a site-specific action, significance would usually depend on the effects in the locale rather than in the world as a whole. Both short- and long-term effects are relevant. (40 CFR Part 1501.3(b)).

Environmental impacts carried forward for more detailed analysis in this EA are noise, air quality, water resources, cultural resources, terrestrial biological resources, public health and safety, and transportation. Potential impacts to the resource areas described below are negligible or nonexistent and, therefore, are not carried forward for further analysis in this EA.

Geological Resources. The proposed action would require modification to and construction of new infrastructure on MCB Hawaii as described in Section 2.1.2. All construction would be in areas that are developed or have been previously disturbed. For construction within landscaped areas, proposed construction would be implemented on soils that have slow runoff, high permeability, and low erosion potential. Construction would be subject to USEPA NPDES Construction General Permit and site-specific Storm Water Pollution Prevention Plans (SWPPPs) specifically designed to minimize erosion and soil loss. Project design and construction engineering control BMPs such as erosion socks, erosion control blankets, silt fencing, and fiber rolls would further reduce any potential for erosion, minimize sedimentation, reduce the flow of stormwater, and minimize the transport of soils and sediment off-site. Regarding training, all training with modernized equipment would be similar to ground-based training that already occurs on O'ahu and would be conducted at locations within each training area currently used for ground-based training with legacy equipment. Proposed training activities would not create expanded ground disturbance at any of the training areas and would follow procedures outlined in MCB Hawaii Order 1500.9C. As such, there would be no impact to geological resources. For these reasons, geological resources are not evaluated further in this EA.

Hazardous Materials and Waste. Construction activities would result in a short-term increase in the use of hazardous materials that would cease at the completion of construction. The hazardous materials to be used are common to construction and include such items as diesel fuel, gasoline, and propane to fuel the construction equipment; hydraulic fluids, oils, and lubricants; welding gases; paints; solvents; adhesives; and batteries. All hazardous materials would be handled and disposed of per applicable regulations and consistent with other construction projects at MCB Hawaii Kaneohe Bay. This includes hazardous materials from facilities demolition/renovation activities such as lead and asbestos should these be encountered during construction. These materials, if encountered, would be taken by licensed transporters and disposed of in permitted landfill facilities in accordance with applicable federal, state, and local laws and regulations. Installation Restoration Program sites exist on base, one of which (the former Quarry Pit Landfill) is near Projects 5, 6, and 7. For construction occurring in the vicinity of Installation Restoration Program sites, hazardous materials and waste, if encountered, would involve additional excavation and disposal at an approved Restoration Conservation Recovery Area disposal

facility. The types of land use control for construction in these areas include coordination with DOH, development of a site-specific SWPPP approved by DOH which incorporates LID features into the projects, disposing properly of any impacted soils, placing a clean fill cap on top, and stormwater sampling. Projects in these locations would follow existing land use controls, including restricting the site to industrial/commercial use, no use for residential purposes, and no use for schools or childcare centers. Adherence to applicable BMPs and Standard Operating Procedures (SOPs) during construction would reduce the likelihood and volume of accidental releases, allow for accelerated spill response times, and enable timely implementation of cleanup measures, thereby minimizing potential impacts to the environment. Hazardous materials associated with construction activities would be delivered and stored in a manner that would prevent these materials from leaking, spilling, and potentially polluting soils, ground, and surface waters and in accordance with applicable federal, state, and local regulations. Public transportation routes would be utilized for the conveyance of hazardous materials to the construction site. Transportation of all materials would be conducted in compliance with U.S. Department of Transportation regulations.

Training with the modernized equipment would be similar to training with the legacy equipment being replaced. The modernized equipment types are based on the same platforms and would operate similarly to the legacy equipment they are replacing. The new equipment would not introduce any new hazardous materials to base operations at MCB Hawaii Kaneohe Bay or within established training areas. Operations at MCB Hawaii Kaneohe Bay would include vehicle and equipment maintenance, would not change from current activities. Therefore, there would be no change to volume and type of fuel, oils, and lubricants used during operations and maintenance. All training with modernized equipment at the training areas would continue to be conducted in accordance with MCB Hawaii Order 1500.9C (MCB Hawaii, 2021a). This order has procedures for managing any release of hazardous materials used in training. For these reasons, hazardous materials and waste are not evaluated further in this EA.

Marine Biological Resources. The proposed action does not include in-water construction or training activities with modernized equipment. ESA-listed marine species with the potential to haul-out on the beaches of MCB Hawaii, MCTAB, and Pu'uloa RTF are addressed in Section 3.5, *Terrestrial Biological Resources*. The proposed action does not change the potential for in-water impacts to marine species. For these reasons, in-water impacts to marine biological resources are not further analyzed in this EA.

Socioeconomics. The proposed action consists of modernization of equipment; infrastructure modifications on MCB Hawaii Kaneohe Bay; and associated training at MCB Hawaii Kaneohe Bay, MCTAB, and Pu'uloa RTF. There would be no change in the number of Marine Corps Hawaii ground forces personnel because of the proposed action. As such, the proposed action would result in no changes to populations outside the base, with no corresponding impacts to employment or industry characteristics; demand for schools, housing, and recreational facilities; or changes to the demographic, economic, and fiscal environment of Kailua, Kāne'ohe, Waimānalo, 'Ewa Beach, and the County of Honolulu. Proposed construction may provide some minor, temporary beneficial impacts to the local economy from construction-related jobs and purchasing, but no long-term increase in employment would result. For these reasons, impacts to socioeconomics are not further analyzed in this EA.

Environmental Justice. In April 2023, the Biden Administration issued Executive Order (EO) 14096, *Revitalizing Our Nation's Commitment to Environmental Justice for All* (2023). This EO created the Justice40 Initiative that will "further embed environmental justice into the work of federal agencies." As part of this initiative, "over-burdened" communities are to be protected from pollution and environmental harms. These communities are identified by census tract using the Climate & Economic Justice Screening Tool. With the exception of Kailua, most of the communities located near MCB Hawaii

Kaneohe Bay MCTAB, and Pu'uloa RTF have a higher percentage of minority race persons and about the same portion of persons in poverty as the greater county and state (U.S. Census Bureau, 2023). Kailua Census Designated Place has much lower minority and poverty population percentages than the county or state.

Proposed construction and training would be located on Marine Corps property, with the exception of vehicles transiting from MCB Hawaii Kaneohe Bay to two Marine Corps training areas over public roads. There would be no risk to public health and safety from proposed training conducted within existing training areas (see Section 3.6, *Public Health and Safety*). For vehicles transiting on public roadways, exposure and risk to the general public from the proposed action is minimal and consistent with the potential for vehicle accidents to occur on any public roadway (see Section 3.7, *Transportation*). In addition, as described further in Chapter 3, construction activities associated with the proposed action would result in less than significant impacts on the physical and natural environment to air quality, water resources, and biological resources. Consequently, proposed construction would not result in disproportionate adverse impacts to low-income or minority populations.

Regarding training, the proposed action would occur at existing training areas on MCB Hawaii Kaneohe Bay, MCTAB, and Pu'uloa RTF. The nearest residential community populations to MCB Hawaii Kaneohe Bay are Kāne'ohe to the south and southwest and Kailua to the south and southeast; for MCTAB, Waimānalo to the south and southeast, Kailua to the northwest, and Lanikai to the north; and for Pu'uloa RTF, 'Ewa Beach to the west and northwest and Iroquois Point to the east. Aside from transportation of equipment and personnel to the three training areas, all training with modernized equipment would be at training areas on O'ahu, similar to existing training with legacy equipment with regard to type and tempo of training, and would not have adverse effects to populations in these areas (see resource-specific impact analyses later in this chapter). Consequently, proposed training would not result in disproportionate adverse human health or environmental impacts to low-income, minority populations, or over-burdened populations. For these reasons, environmental justice is not further analyzed in this EA.

Land Use. MCB Hawaii Kaneohe Bay is an existing military installation, and all proposed construction would occur within base boundaries and be consistent with the military mission. As explained in Section 2.1.3, the proposed training does not represent a different approach or impact different resource areas when compared to the training that currently occurs at these locations. The modernized equipment and training do not change any types of land uses or public activities conducted in and around these locations. Therefore, no new land uses would result from the proposed action, thus land use is not evaluated further in this EA.

Recreation. Proposed construction would occur entirely on Marine Corps property. Public access is not allowed at MCB Hawaii Kaneohe Bay, at Pu'uloa RTF, and public access is limited at MCTAB to weekends when training is not occurring. The proposed action does not change these restrictions or impact public access to MCTAB, thus recreation is not evaluated further in this EA.

Infrastructure and Utilities Systems. None of the proposed construction projects or training would require significant alterations or upgrades to the existing utilities and infrastructure system capacity. Water, sewer, and electrical utilities would be improved, as necessary, within the proposed construction footprints. Proposed construction and training would not increase the demand for the utilities systems. Increased training tempo under Alternative 2 would increase fuel usage for modernized equipment but would not alter the utilities demand generated at any of the training areas. Electrical power, potable water, wastewater, solid waste, stormwater, and information technology/communications

infrastructure and capacity would be adjusted based on new construction, but the proposed action does not represent a meaningful capacity increase in any of these systems. For these reasons, infrastructure and utilities are not evaluated further in this EA.

3.1 Noise

Noise is generally defined as unwanted sound. From a physical standpoint, there is no distinction between noise and desired sound, as both consist of vibrations through air. The distinction arises from the brain's perception of the sound as wanted, expected or pleasant, as opposed to "noise," which is perceived as unpleasant, loud, or disruptive to hearing. Noise may be intermittent or continuous, steady or impulsive, and stationary or transient. Common noise-sensitive public receptors include schools, residential areas, and recreational areas. This section applies to human receptors; impacts to wildlife are addressed in Section 3.5, *Terrestrial Biological Resources*.

The physical characteristics of noise include its intensity, frequency, and duration. The large variation in sound intensities affecting humans range from a soft whisper to a jet engine resulting in sound levels typically presented using a logarithmic scale. The unit used to measure the intensity of sound is the decibel (dB) and human hearing ranges up to 120 dB, at which point sound causes physical discomfort. The frequency of sound is measured in cycles per second, or hertz. Low frequency sounds are heard as rumbles or roars, and high frequency sounds are heard as screeches. Sound levels are further refined using frequency "weighting." The human ear is most sensitive to frequencies in the 1,000 to 4,000 hertz range. Sound meters calibrated to emphasize frequencies in this range and de-emphasize very low or very high frequencies are termed "A-weighted," and sound is identified in terms of A-weighted decibels (dBA). Unless otherwise stated in the EA, dB units refer to dBA-weighted sound levels. At approximately 3 feet, sound from normal human speech ranges from 63 to 65 dBA, operating kitchen appliances range from 83 to 88 dBA, and rock bands approach 110 dBA (Cowan, 1994).

The day-night average sound level (DNL) represents the primary noise metric utilized by both DoD and the Federal Aviation Administration (FAA) for assessing environmental noise, which is the sound level measured over a 24-hour period, with a 10 dB adjustment assigned to noise events occurring between 10 p.m. and 7 a.m. (often referred to as "DNL nighttime") (DoD, 2020; FAA, 2020). The adjustment accounts for the added intrusiveness of noise events affecting people during the DNL nighttime period. Most people are routinely exposed to sound levels of 50 to 55 DNL or higher (Federal Interagency Committee on Urban Noise, 1980). Both the DoD and FAA have adopted 65 dBA DNL as the threshold for potential land use incompatibility (DoD, 2021). Areas exposed to less than 65 dB DNL are considered compatible for all land uses.

3.1.1 Affected Environment

3.1.1.1 MCB Hawaii Kaneohe Bay

The predominant noise sources at MCB Hawaii Kaneohe Bay are the aircraft using the airfield, training activities at installation ranges, and vehicle traffic on base roadways. Community and school locations around MCB Hawaii Kaneohe Bay currently experience an average noise level of 41 to 43 dB DNL from aircraft activities, well under the 65 dB DNL compatibility level (Marine Corps, 2022).

Training areas at the base are within base boundaries. The ranges within the Ulupa'u Crater of Kāne'ohe Bay provide live-fire training, including military small arms, .50 caliber, 60mm mortars, rockets, and explosives training up to 12.5 pounds Net Explosives Weight. Training at the MOUT site at Pyramid Rock in the northwest portion of the base consists of non-live-fire urban training with use of small explosive charges. On the eastern portion of the base, the Boondocker LZ training area located in the southeastern side of Kāne'ohe Bay (as shown in Figures 1-2 and 2-1) supports non-live-fire MOUT and Helicopter Rope Suspension Techniques training, and LZ Eagle (adjacent to Fort Hase Beach) provides

basic aviation training. In addition to the natural land features buffering the training areas, these training activities are between 0.5 and 2 miles away from the local community.

Table 3.1-1 lists the approximate distances to nearby communities from the closest portion of each training area. For MCB Kaneohe Bay, the nearest population to training is Kailua, located 0.5 mile south of Boondocker LZ.

Table 3.1-1 Distances from Training Areas to Nearest Communities

<i>Training Area</i>	<i>Nearest Distance</i>	<i>Community</i>
MCB Hawaii Kaneohe Bay		
Boondocker LZ	0.5 mile	Kailua
Fort Hase Beach	0.8 mile	Kailua
Ulupa'u Crater	2 miles	Kailua
Pyramid Rock	2 miles	Kāne'ohe
Pyramid Rock	3 miles	Heeia
MCTAB		
Southernmost LZs	0.1 mile	Waimānalo
MOUT Training Areas	0.1 mile	Kailua
MOUT Training Areas	0.3 mile	Lanikai
Pu'uloa RTF		
Southwestern portion	Adjacent	'Ewa Beach Park
Southwestern portion	0.06 mile (320 feet)	'Ewa Beach (along beach)
Eastern portion	0.1 mile	Iroquois Point
Eastern portion	0.3 mile	Iroquois Point Elementary School
Western portion	0.6 mile	'Ewa Beach (inland)
Northwestern portion	0.8 mile	'Ewa Beach Country Club golf course

Notes: Distances are approximate from nearest portion of training area to nearest portion of community.

Legend: LZ = Landing Zone; MCB = Marine Corps Base; MCTAB = Marine Corps Training Area Bellows; MOUT = Military Operations Urban Training; RTF = Range Training Facility.

Ground-based training with legacy cannon sections and mobile radar equipment currently occurs approximately 650 times per year throughout the training areas at MCB Hawaii Kaneohe Bay. This is the approximate equivalent of between one and two times per day on average. The largest vehicles used for current ground-based training are the 7-ton trucks used to support cannon section training. At 50 feet, trucks of equivalent size (e.g., construction trucks) generate a noise level of 82 dB, decreasing to approximately 54 dB at 500 feet. Consequently, received noise levels in the local community, which is a minimum of 0.5 mile away from current ground-based training, are compatible with the existing noise environment (Marine Corps, 2022).

3.1.1.2 MCTAB

The main noise sources at MCTAB are vehicles, amphibious vehicles, rotary-wing aircraft, simulated explosives, and blank gunfire used during military training. Military vehicle activities occur throughout MCTAB on roadways and designated paths, including legacy training with cannon sections and radar systems. The beaches at MCTAB are used for amphibious training comprised of amphibious vehicles transiting between the waterline and the fenced area via established vehicle pathways. MCTAB is used for approximately 350 landing events per year for rotary-wing (helicopters) and tilt-rotor (MV-22s) aircraft. Aviation and amphibious training includes five LZs for rotary-wing aircraft, drop zones (for personnel and equipment being airdropped via parachute from aircraft), and low-level flight training

(rotary-wing aircraft). The MV-22 generates single event ground noise levels of up to 99 dB under the downwind portion of the aircraft's flight path while operating at 300 feet above the ground (Marine Corps, 2012). Additionally, existing training uses simulate explosives and blank fire. Most of these activities occur during daylight hours, with only approximately 4% occurring after 10 p.m. (Marine Corps, 2012).

With the exception of aviation and amphibious vehicle training, ambient noise levels in this area average hourly equivalent sound levels of 54 dB during daytime hours (7 a.m.–10 p.m.) and 45 dB during nighttime hours (10 p.m.–7 a.m.) (Navy, 2018).

Ground-based training occurs approximately 620 times per year at MCTAB, or on average between 1 to 2 times per day. This involves convoys of legacy vehicles, equipment, and personnel traveling from MCB Hawaii Kaneohe Bay to the MCTAB training areas (see Section 3.7, *Transportation*). These convoys are along existing roadways and produce noise consistent with typical civilian roadway noise. Ground-based training currently occurs within MCTAB's boundaries greater than 500 feet from the boundaries of the training area.

Military training at MCTAB occurs primarily on weekdays, and the public is not allowed onto MCTAB while training occurs. The beaches are typically available to civilian camping and recreational use on the weekends and on weekdays when not used for training. The nearest residential community populations to portions of MCTAB are Waimānalo at 0.1 mile (about 500 feet) to the south and southeast, Kailua 0.1 mile to the northwest, and Lanikai 0.3 mile to the north (see Table 3.1-1). Noise from military training at MCTAB is separated from these communities by intervening terrain, thick vegetation, and vehicle traffic along Kalaniana'ole Highway. As such, noise levels in the local community from current ground-based training are less than 54 dB and are compatible with the existing noise environment.

3.1.1.3 Pu'uloa RTF

The main noise sources at Pu'uloa RTF are small-weapons firing (rifles and pistols), use of loudspeakers to ensure range safety, aircraft activity associated with Daniel K. Inouye International Airport and Joint Base Pearl Harbor-Hickam airfield, and infrequent amphibious vehicle activities that occur during special event training exercises. Noise from small-weapons firing and use of the loudspeakers are audible in communities in adjacent areas. The State of Hawai'i Department of Transportation (HDOT) has noise exposure maps that identify noise exposure contours from aircraft traffic associated with Daniel K. Inouye International Airport. The 55 dB noise contour intersects the northern portion of Pu'uloa RTF and the shoreline area, including the adjacent residential areas (MCB Hawaii, 2019).

Ground-based training, which consists mostly of small arms qualification and training, occurs approximately 180 times per year within Pu'uloa RTF boundaries, or on average approximately once every 2 days. Ground-based training with legacy equipment involves convoys of vehicles, equipment, and personnel from MCB Hawaii Kaneohe Bay to Pu'uloa RTF (see Section 3.7, *Transportation*). These convoys are along existing roadways and generate noise consistent with typical civilian roadway noise.

The nearest residential community populations are a small cluster of homes in 'Ewa Beach within 300 feet of the southwest corner of Pu'uloa RTF, Iroquois Point approximately 500 feet to the east, and 'Ewa Beach 320 feet to the west and northwest (see Table 3.1-1). 'Ewa Beach Park is immediately adjacent to Pu'uloa RTF to the west. Iroquois Point Elementary School is located 0.3 mile to the northeast. Noise from training at Pu'uloa RTF is affected by overflight of inbound commercial aircraft, the ocean, and high berms on the ranges. There is also a 300-foot buffer to the east and west between the ranges and

housing. The 'Ewa Beach community, approximately 0.6 mile to the northwest, is separated from Pu'uloa RTF by intervening trees and the 'Ewa Beach Country Club golf course. There is no public access to the beach adjacent to Pu'uloa RTF, but the public does use public and private beaches to the east and west of Pu'uloa RTF property lines.

As noted earlier, areas outside of Pu'uloa RTF typically experience aircraft noise at levels that are near 55 dB, which is considered compatible for all land uses (MCB Hawaii, 2019). Current ground-based training with legacy equipment at Pu'uloa RTF occurs in the southwestern portion of the training area and can potentially be 320 feet to the nearest community. At 50 feet, trucks of equivalent size (e.g., construction trucks) generate a noise level of 82 dB; at 300 feet, this level decreases to approximately 60 dB. This noise level is compatible with the existing land use surrounding the facility.

3.1.2 Environmental Consequences

3.1.2.1 No-Action Alternative

Under the No-Action Alternative, the proposed action would not occur and there would be no change to noise.

3.1.2.2 Facilities Alternatives

Preferred Facilities Locations

Construction would result in short-term, intermittent noise impacts from the operation of heavy equipment, power and hand tools, and construction vehicles in discrete areas on MCB Hawaii Kaneohe Bay. Construction equipment operation would occur sporadically throughout daytime hours. Noise would also be generated by trucks delivering materials to the construction site and construction worker vehicles. Within the proposed construction footprint, all construction would occur in operational areas on MCB Hawaii Kaneohe Bay, which are already subject to industrial and aircraft noise. There are no sensitive human receptors, such as schools or daycare centers near proposed construction areas. Base housing north of Mōkapu Road would be the nearest on-base noise sensitive receptor, which would be approximately 200 feet north of the proposed consolidated Paraloft and Dive Shop and 3d Radio Battalion Boat Shop shown in Figures 2-1 and 2-2. The Mōkapu Elementary School is not near any of the proposed construction locations. All construction would be consistent with existing noise onboard MCB Hawaii Kaneohe Bay. Hawai'i Administrative Rule (HAR) Chapter 11-46, *Community Noise Control*, specifies acceptable noise levels for a Class A zoning district (equivalent to lands zoned for residential, conservation, or public space) to be 55 dBA during hours of 7 a.m. to 10 p.m. (DOH, 1969). The rule further states that "[n]oise levels shall not exceed the maximum permissible sound level for more than ten percent of the time within any twenty-minute period, except by permit or variance." At 50 feet, the loudest construction equipment (a bulldozer) would generate a noise level of 82 dB, at 500 feet this level would decrease to approximately 54 dB resulting in noise levels that would be compatible with the existing noise environment. Therefore, a construction noise permit or variance under HAR Chapter 11-46 would not be required. The proposed construction project nearest to the local community in the southeastern portion of the base is 0.6 mile from the closest residence. Received noise levels in the local community would be less than 54 dB, which would be compatible with the existing noise environment. For these reasons, the preferred facilities locations would have less than significant noise impacts.

Alternate Facilities Locations

Under this alternative, alternate facilities locations would primarily involve reuse and renovation of existing facilities, and there would be minimal construction. The only construction that would occur would be for Project 2 near Building 6468 and Project 3 at the 1/12 Gun Park. These locations are in developed areas of the base and are the same general distances from sensitive noise receptors as the preferred facilities construction locations described above. The type of noise effects during construction would be identical, but the construction period would be shorter. As a result of its reduced minimal construction, the noise for alternative facilities would be less than the preferred alternative. As such, like the preferred alternative, the alternate facilities locations would have less than significant noise impacts.

3.1.2.3 Operational Alternatives

Alternative 1

MCB Hawaii Kaneohe Bay

As described in Section 2.1.3, training associated with the modernized equipment at MCB Hawaii Kaneohe Bay is consistent in type and tempo with existing training with legacy equipment at the range, including movement of vehicles from support facilities on the installation to various training locations on the installation. This would occur approximately 650 times per year under Alternative 1, which is identical to the amount of training that currently occurs. Vehicle noise would occur along the roadways and established vehicle paths at the training areas. The types of vehicles associated with the modernized equipment are similar to vehicles currently used for training. Modernized equipment would be generally the same size or smaller than the legacy equipment it is replacing. For example, the JLTV would replace the current larger 7-ton truck for NMESIS training, the MADIS and L-MADIS vehicles would replace the larger UTV, and the G/ATOR would be transported via the MTRV and HMMWV, as well as continued use of 7-ton trucks. The Marine Corps in Hawai'i already regularly use the JLTV, MTRV, and HMMWV in training. The engine types and sizes for the modernized equipment are similar in type and operational characteristics to existing legacy equipment and the vehicles associated with modernized equipment are the same size or smaller than legacy equipment. For reference, the existing HMMWV produces noise levels that are below 85 dB at low to medium speeds and can be over 100 dBA at top speed for some models (U.S. Army Center for Health Promotion and Preventative Medicine Hearing Conservation Program, 2006). In contrast, the JLTV generates noise levels varying from 72 to 91 dB at 100 feet, with the greatest noise levels occurring during high-speed acceleration (Marine Corps, 2021). Although the exact conditions under which the two vehicles were measured may differ, given the similarity in size and engine displacement and the available data, noise levels generated from modernized equipment would likely be similar or slightly quieter than legacy equipment while operating at the proposed training areas.

Training with the modernized equipment would occur in the same locations and be of the same type and tempo as current ground-based training with legacy equipment. Given the similarity of the equipment and the training and tempo (Section 2.2.1), there would be no significant change to the type and amount of noise generated by the vehicles or training activities associated with modernized equipment from existing conditions. As described above for MCB Hawaii Kaneohe Bay training areas, noise levels in the local community from current ground-based training are less than 54 dB and are compatible with the existing noise environment. Due to the similar vehicle/equipment characteristics and exact same locations for training, noise levels under Alternative 1 would be similar for training with

legacy equipment. Community populations are 0.5 mile away at the closest training location (Boondocker) and notably farther away from other training locations such as Ulupa'u Crater and Pyramid Rock (see Table 3.1-1). In addition, no live-fire training would occur with the modernized equipment at MCB Hawaii Kaneohe Bay. Consequently, proposed training with modernized equipment would not alter the noise environment at or surrounding MCB Hawaii Kaneohe Bay.

MCTAB

Modernized equipment training would involve movement of vehicles from support facilities at MCB Hawaii Kaneohe Bay to MCTAB. This would occur approximately 620 times per year under Alternative 1, which is identical to the amount of ground-based training that currently occurs there with legacy equipment. As described for MCB Hawaii Kaneohe Bay, the modernized equipment would generate similar noise levels as current equipment, so equipment noise from vehicles and training activities would not noticeably change over existing conditions. Moreover, again as identified for MCB Hawaii Kaneohe Bay and in Section 2.2.1, the type and tempo of the training is similar to existing training with legacy equipment. Lastly, vehicle noise onboard MCTAB is lower than the predominant noise sources from military training at MCTAB, which are aircraft hovering and landing events that occur throughout the year. As described above for MCTAB training areas (Section 3.1.1.2), noise levels in the local community from current ground-based training are less than 54 dB and are compatible with the existing noise environment. Therefore, proposed training with modernized equipment would not alter the existing noise environment at or surrounding MCTAB.

Pu'uloa RTF

Like with MCTAB, modernized equipment training would involve movement of vehicles from support facilities at MCB Hawaii Kaneohe Bay to Pu'uloa RTF. This would occur approximately 180 times per year under Alternative 1, which is identical to the level of vehicle transport for small weapons' qualification and training that currently occurs there. The analysis of vehicle noise and training activities with modernized equipment for MCTAB is equally applicable for Pu'uloa RTF, resulting in noise not significantly different from existing conditions. Vehicle noise generated during training with modernized equipment at Pu'uloa RTF would not be above 54 dB in any noise sensitive areas. The nearest public receptor is 'Ewa Beach Park adjacent to the range, and the nearest residents would be 320 feet and 0.2 mile to Iroquois Point and 'Ewa Beach, respectively. Lastly, vehicle noise levels would be lower than the predominant noise source from military training at Pu'uloa RTF, which is live-fire small weapons training that occurs on weekdays throughout the year. The level of live-fire small weapons training and associated noise levels from such small weapons training would not change under Alternative 1. Noise levels in the local community from training with modernized equipment would continue to be at or less than 54 dB and, therefore, would be indistinguishable from the existing noise environment. Therefore, proposed training with modernized equipment would not alter the dominant source of noise in the existing noise environment at or surrounding Pu'uloa RTF.

For these reasons, Alternative 1 training with modernized equipment would have less than significant impacts to noise.

Alternative 2

Under Alternative 2, there would be an increase of approximately 130 ground equipment training events per year with modernized equipment for MCB Hawaii Kaneohe Bay, 125 per year for MCTAB, and 35 per year for Pu'uloa RTF. This would be an average of 2.5 additional ground equipment training events per week for MCB Hawaii Kaneohe Bay and MCTAB and an average of 0.7 additional ground

equipment training events per week for Pu'uloa RTF. All other training (e.g., small arms fire) at the three Marine Corps training areas would remain unchanged. The increased training would occur in areas that experience multiple types of training on a regular basis throughout the year.

Given the similarity of the equipment and the nature of the training and tempo (Section 2.2.1), there would be virtually no change to the type and amount of noise generated by the vehicles or training activities from existing conditions under Alternative 2. All other training (e.g., small arms fire) at the three Marine Corps training areas would remain unchanged. The minimal increase in training tempo equates to an increase in military-generated noise of less than 1 dB DNL because neither the existing or proposed modernized ground equipment generate high noise levels in comparison to the more dominant types of training activities that occur at the three Marine Corps training areas, such as aircraft activities and small arms firing. As such, the proposed training with modernized equipment is considered less than significant to the overall noise environment.

3.2 Air Quality

This discussion of air quality includes criteria pollutants, standards, sources, permitting, and greenhouse gases (GHGs). The concentration of various pollutants in the atmosphere defines the air quality in a region or at a specific location. Many factors influence a region's air quality, including the type and quantity of pollutants emitted into the atmosphere, the size and topography of the air basin, and the prevailing meteorological conditions.

Most air pollutants originate from human-made sources, including mobile sources (e.g., aircraft, cars, trucks, buses) and stationary sources (e.g., factories, refineries, power plants), as well as indoor sources (e.g., some building materials and cleaning solvents). Natural sources, such as volcanic eruptions and forest fires, also release pollutants into the air.

3.2.1 Affected Environment

The affected environment for air quality consists of the island of O'ahu generally, but expands to include the state of Hawai'i when GHGs and climate change effects are considered. Air quality in the state of Hawai'i can be generally characterized as relatively low in pollution. Data from DOH air quality monitoring stations indicate the state is in attainment of all National Ambient Air Quality Standards (NAAQS), with the exception of exceedances for sulfur dioxide (SO₂) and particulate matter less than or equal to 2.5 micrometers in diameter (PM_{2.5}) in communities near the volcano on Hawai'i Island, which is considered by the USEPA as a natural, uncontrollable event (DOH, 2022). According to the USEPA Green Book, all counties within the state of Hawai'i are in attainment (USEPA, 2023). Because the state is in attainment of the NAAQS, it is not subject to the General Conformity Rule under the Clean Air Act.

On O'ahu, the prevailing trade winds come from the northeast throughout the year. Figure 3.2-1 shows a wind rose for data collected from 2014 to 2018 by the weather station (PHNL) located at Daniel K. Inouye International Airport in Honolulu. The wind rose shows which direction the winds blow from towards the center point, and the length of each color indicates how often the wind blows from that direction and the wind speed. The slowest winds (mostly in yellow) are closest to the center of the diagram.

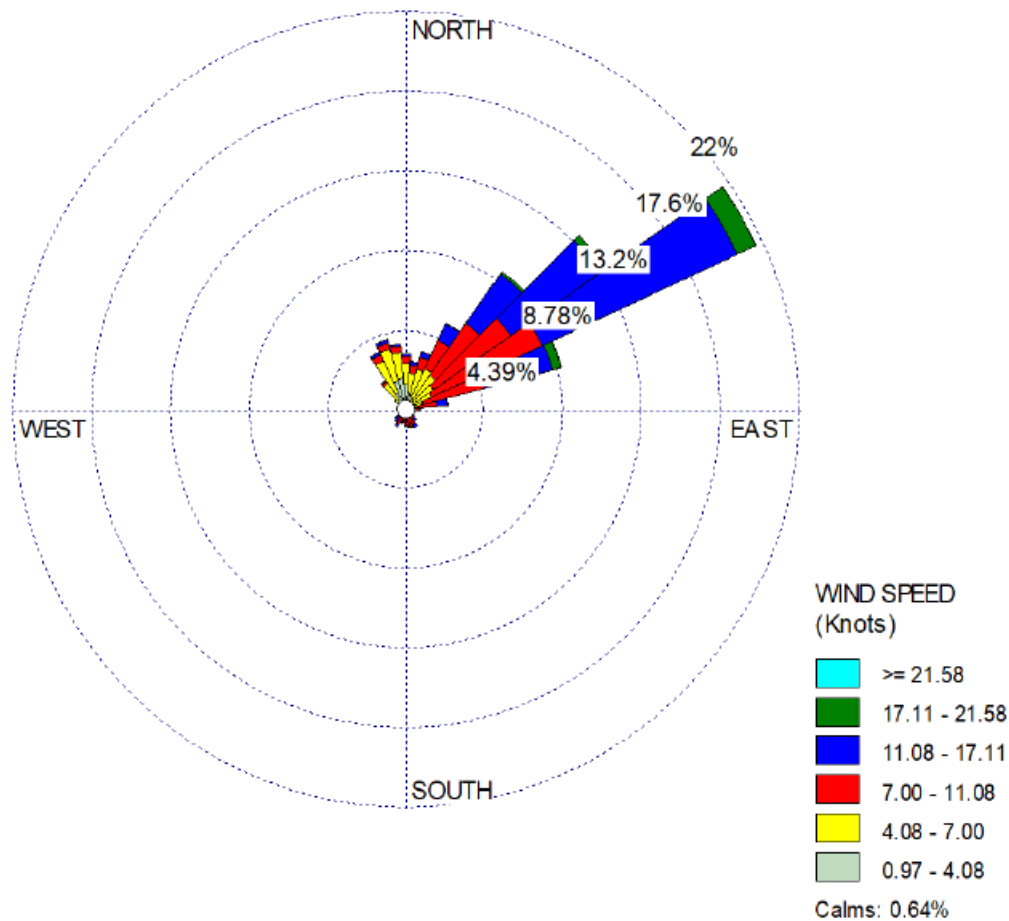


Figure 3.2-1 Wind Rose, Honolulu 5-year (2014–2018) Hourly Winds

MCB Hawaii Kaneohe Bay is located on the east side of the island. Emission sources at MCB Hawaii Kaneohe Bay generally include fuel combustion by aircraft engines and motor vehicles, and facility boilers and generators. A corrosion control hangar operates under a DOH Clean Air Branch “non-covered” (i.e., minor) emissions permit (Naval Facilities Engineering Systems Command [NAVFAC] Pacific, 2018).

Emission sources in operation at MCTAB and Pu‘uloa RTF generally include fuel combustion from aircraft, ground vehicles, amphibious vehicles, and vehicle convoys from MCB Hawaii Kaneohe Bay. Baseline operational emissions from military vehicles transporting equipment and personnel within MCB Hawaii Kaneohe Bay and to both off-base locations for training were calculated based on the total annual miles traveled in a typical year and are shown in Table 3.2-1.

Table 3.2-1 Annual Baseline Estimated Emissions for Vehicle Travel for Training Activity

<i>Scenario</i>	<i>VOC (tons)</i>	<i>CO (tons)</i>	<i>NO_x (tons)</i>	<i>SO₂ (tons)</i>	<i>PM₁₀ (tons)</i>	<i>PM_{2.5} (tons)</i>	<i>CO₂ (metric tons)</i>
Baseline: vehicle travel for training activity	0.02	0.10	0.18	0.00	0.08	0.02	50

Legend: CO = carbon monoxide; CO₂ = carbon dioxide; NO_x = nitrogen oxides; PM₁₀ = particulate matter less than or equal to 10 micrometers in diameter; PM_{2.5} = particulate matter less than or equal to 2.5 micrometers in diameter; SO₂ = sulfur dioxide; VOC = volatile organic compound.

3.2.2 Environmental Consequences

To evaluate potential impacts to air quality, emissions were estimated for both construction and training associated with modernized equipment under the proposed action. Construction activities evaluated the use of construction equipment and other fuel-burning sources as the primary emission sources. Fugitive dust emissions from earth disturbance during construction were estimated based on the areas with potential ground disturbance and emissions factors from USEPA AP-42, *Compilation of Air Pollutant Emissions Factors*. Emissions factors, assumptions, and calculations are provided in Appendix F.

The training activities are evaluated through any changes in emissions from either stationary or mobile sources resulting from the proposed action. This evaluation assumes all equipment would be diesel-powered. Estimates of equipment emissions were based on the estimated hours of usage and emission factors for each anticipated mobile source. This analysis evaluated nitrogen oxides (NO_x), volatile organic compound (VOC), carbon monoxide (CO), carbon dioxide (CO₂), particulate matter less than or equal to 10 micrometers in diameter (PM₁₀), PM_{2.5}, and SO₂ related to heavy-duty diesel equipment and on road trucks and commuter vehicles.

Air quality impacts within the affected environment were reviewed relative to federal, state, and local air pollution standards and regulations. Since the state of Hawai'i is in attainment of the NAAQS for all criteria pollutants, this air quality analysis uses the USEPA's Prevention of Significant Deterioration stationary source permitting threshold of 250 tons per year as an indicator of the local significance of potential impacts to air quality.

3.2.2.1 No-Action Alternative

Under the No-Action Alternative, the proposed action would not occur and there would be no change to air quality.

3.2.2.2 Facilities Alternatives

Preferred Facilities Locations

Construction activities during implementation of Alternative 1 would generate short-term, temporary air emissions such as fugitive dust and combustion of fossil fuels from construction equipment and contractor vehicles. Proposed construction and demolition activities would primarily occur on the eastern part of MCB Hawaii Kaneohe Bay. The proposed construction activities would occur over 8 years.

This analysis looked at VOCs, CO, NO_x, SO₂, PM₁₀, PM_{2.5}, and CO₂ related to heavy-duty diesel equipment and on-road trucks and contractor vehicles using the USEPA's Motor Vehicle Emission Simulator emission factor model. The earth disturbance-related fugitive dust emissions were estimated based on

the areas with potential ground disturbance using USEPA AP-42 PM emission factors. Table 3.2-2 summarizes the estimated annual construction emissions under Alternative 1.

Table 3.2-2 Estimated Air Emissions from Construction under Preferred Facilities Locations

<i>Year</i>	<i>VOC (tons)</i>	<i>CO (tons)</i>	<i>NO_x (tons)</i>	<i>SO₂ (tons)</i>	<i>PM₁₀ (tons)</i>	<i>PM_{2.5} (tons)</i>	<i>CO₂ (metric tons)</i>
Year 1	0.73	3.82	11.62	0.13	2.84	0.83	1,086
Year 2	0.59	3.28	10.09	0.10	1.19	0.59	936
Year 3	0.41	2.26	7.82	0.05	0.61	0.40	707
Year 4	0.41	2.24	7.79	0.05	0.63	0.40	704
Year 5	0.42	2.28	7.92	0.05	0.68	0.42	717
Year 6	0.41	2.27	7.84	0.05	0.58	0.39	710
Year 7	0.42	2.29	7.94	0.05	0.84	0.42	719
Year 8	0.40	2.22	7.71	0.05	0.46	0.38	697
Comparative Threshold	250	250	250	250	250	250	N/A
Exceeds Threshold?	No	No	No	No	No	No	N/A

Legend: CO = carbon monoxide; CO₂ = carbon dioxide; N/A = not applicable; NO_x = nitrogen oxides; PM₁₀ = particulate matter less than or equal to 10 micrometers in diameter; PM_{2.5} = particulate matter less than or equal to 2.5 micrometers in diameter; SO₂ = sulfur dioxide; VOC = volatile organic compound.

Proposed construction would result in short-term, intermittent air quality impacts on MCB Hawaii Kaneohe Bay due to the operation of construction equipment and contractor vehicles. Site grading would result in localized increases in particulate matter. All construction-related emissions would be well below the comparative threshold levels (see Table 3.2-2), and thus do not significantly deteriorate the attainment areas of Hawai'i and O'ahu. All construction activities would comply with the provisions of HAR 11-60.1-33, *Fugitive Dust*, and employ dust management BMPs such as regular watering, to ensure compliance with regulatory limits. The distance to the closest downwind sensitive receptors is approximately 0.57 mile to the nearest off-base residential area from any of the proposed construction locations. In summary, because construction air emissions would be temporary in nature, over one-half mile from any sensitive receptor, and would utilize HAR mandatory construction BMPs, the preferred facilities locations would have less than significant impacts to air quality.

Impacts due to GHG emissions are analyzed in Section 4.4, *Cumulative Impact Analysis*.

Alternate Facilities Locations

Table 3.2-3 summarizes the estimated annual construction emissions under the alternate facilities locations.

Table 3.2-3 Estimated Air Emissions from Construction under Alternate Facilities Locations

<i>Year</i>	<i>VOC (tons)</i>	<i>CO (tons)</i>	<i>NO_x (tons)</i>	<i>SO₂ (tons)</i>	<i>PM₁₀ (tons)</i>	<i>PM_{2.5} (tons)</i>	<i>CO₂ (metric tons)</i>
Year 1	0.22	1.26	3.33	0.05	0.52	0.23	320
Year 2	0.22	1.23	3.20	0.05	0.29	0.20	307
Year 3	0.21	1.20	3.13	0.05	0.22	0.19	301
Year 4	0.21	1.19	3.10	0.05	0.22	0.18	298
Year 5	0.21	1.21	3.14	0.05	0.11	0.19	302
Year 6	0.21	1.21	3.15	0.05	0.22	0.19	303
Year 7	0.21	1.21	3.15	0.05	0.25	0.19	303
Year 8	0.21	1.19	3.09	0.05	0.20	0.18	297
Comparative Threshold	250	250	250	250	250	250	N/A
Exceeds Threshold?	No	No	No	No	No	No	N/A

Legend: CO = carbon monoxide; CO₂ = carbon dioxide; N/A = not applicable; NO_x = nitrogen oxides; PM₁₀ = particulate matter less than or equal to 10 micrometers in diameter; PM_{2.5} = particulate matter less than or equal to 2.5 micrometers in diameter; SO₂ = sulfur dioxide; VOC = volatile organic compound.

Under this alternative, alternate facilities locations would primarily involve reuse and renovation of existing facilities with minimal construction. The only construction that would occur would be for Projects 2 and 3, which would involve the renovation, demolition, and construction of new buildings. The magnitude of construction activities would be less than for the preferred facilities. Like with the preferred alternative, air emissions would be temporary in nature, the distance to the closest downwind sensitive receptors is approximately 0.57 mile, and the proposed construction would adhere to HAR requirements for managing fugitive dust, resulting in the alternate facilities locations having less than significant impacts to air quality.

3.2.2.3 Operational Alternatives

Alternative 1

As noted previously in the EA, the modernized equipment would have similar operational characteristics to those used historically. This includes:

- NMESIS – replacing the existing MTRV 7-ton truck (powered by a 426-horsepower, 11.9-liter turbocharged, diesel engine) with the JLTV (powered by a 6.6-liter diesel engine);
- MADIS – using the JLTV (see above);
- L-MADIS –using the UTV or ULTV (powered by a 3-cylinder, 875-cubic centimeter petrol engine or turbocharged diesel engine or 118-horsepower, 4-cylinder turbo diesel engine); and
- G/ATOR – consolidating several systems into a single system and being transported via the MTRV and HMMWV (powered by a 130-horsepower, 6.2-liter diesel engine).

The Marine Corps in Hawai'i currently uses the JLTV, MTRV, and HMMWV. In addition, training with the modernized equipment would occur in the same locations and be of the same type, and, under Alternative 1, consist of the same tempo as current ground-based training with legacy equipment, with no change in miles traveled by vehicles transporting personnel and equipment between MCB Hawaii Kaneohe Bay and the two off-base training areas. Table 3.2-4 presents training emissions of Alternative 1 and the change from existing training emissions. Emissions would remain similar to or slightly reduced under Alternative 1 compared to baseline conditions for criteria pollutants. As shown in Table 3.2-4, emissions would not exceed the regulatory threshold for any criteria pollutant and therefore,

Alternative 1 training would have less than significant impacts to air quality. Impacts due to GHG emissions are analyzed in Section 4.4, *Cumulative Impact Analysis*.

Table 3.2-4 Net Change in Annual Estimated Emissions under Alternative 1

<i>Scenario</i>	<i>VOC (tons)</i>	<i>CO (tons)</i>	<i>NO_x (tons)</i>	<i>SO₂ (tons)</i>	<i>PM₁₀ (tons)</i>	<i>PM_{2.5} (tons)</i>	<i>CO₂ (metric tons)</i>
Baseline: vehicle travel for training activity	0.02	0.10	0.18	0.00	0.08	0.02	50
Alternative 1: vehicle travel for training activity	0.02	0.05	0.16	0.00	0.00	0.00	16
Net change in annual emissions	0.00	-0.05	-0.02	0.00	-0.08	-0.02	-34
Comparative Threshold	250	250	250	250	250	250	N/A
Exceeds Threshold?	No	No	No	No	No	No	N/A

Legend: CO = carbon monoxide; CO₂ = carbon dioxide; N/A = not applicable; NO_x = nitrogen oxides; PM₁₀ = particulate matter less than or equal to 10 micrometers in diameter; PM_{2.5} = particulate matter less than or equal to 2.5 micrometers in diameter; SO₂ = sulfur dioxide; VOC = volatile organic compound.

Alternative 2

As described in Section 3.1, *Noise*, operation of modernized equipment under Alternative 2 would be the same as described for Alternative 1, but there would be an increase in training tempo with ground equipment. This would result in a change in the total annual miles driven by vehicles to move personnel and equipment from MCB Hawaii Kaneohe Bay to conduct training. Table 3.2-5 shows the estimated emissions under Alternative 2 when compared to baseline scenario.

Table 3.2-5 Net Change in Annual Estimated Emissions under Alternative 2

<i>Scenario</i>	<i>VOC (tons)</i>	<i>CO (tons)</i>	<i>NO_x (tons)</i>	<i>SO₂ (tons)</i>	<i>PM₁₀ (tons)</i>	<i>PM_{2.5} (tons)</i>	<i>CO₂ (metric tons)</i>
Baseline: vehicle travel for training activity	0.02	0.10	0.18	0.00	0.08	0.02	50
Alternative 2: vehicle travel for training activity	0.03	0.06	0.20	0.00	0.00	0.00	20
Net change in annual emissions	0.01	-0.04	0.02	0.00	-0.08	-0.02	-30
Comparative Threshold	250	250	250	250	250	250	N/A
Exceeds Threshold?	No	No	No	No	No	No	N/A

Legend: CO = carbon monoxide; CO₂ = carbon dioxide; N/A = not applicable; NO_x = nitrogen oxides; PM₁₀ = particulate matter less than or equal to 10 micrometers in diameter; PM_{2.5} = particulate matter less than or equal to 2.5 micrometers in diameter; SO₂ = sulfur dioxide; VOC = volatile organic compound.

As with the preferred alternative, while estimated emissions for VOCs, CO, NO_x, SO₂, PM₁₀, PM_{2.5}, and CO₂ would increase slightly under Alternative 2 compared to Alternative 1, emissions remain well below threshold levels. As such, Alternative 2 training, while resulting in slightly more emissions, would still have less than significant impacts to air quality.

3.3 Water Resources

Water resources include marine waters, groundwater, surface water, wetlands, floodplains, and drainages. This section identifies the existing condition of water resources and analyzes the impacts of the proposed action on those resources. The affected environment for water resources consists of the construction footprint at MCB Hawaii Kaneohe Bay; the training areas at MCB Hawaii Kaneohe Bay, MCTAB, and Pu'uloa RTF; and the immediately adjacent areas.

3.3.1 Affected Environment

A description of water resources is presented below for MCB Hawaii Kaneohe Bay, MCTAB, and Pu'uloa RTF. Current training adheres to MCB Hawaii Order 1500.9C (see Section 2.1.3.2) requirements to protect water resources. These restrictions include prohibitions on disposing of oil, fuel, or hazardous materials onto the ground or water and use of detergents or chemicals for cleaning/maintaining vehicles and equipment. MCB Hawaii Order 1500.9C also requires training units to avoid wetlands at MCB Hawaii Kaneohe Bay and Waimānalo Stream at MCTAB. Because construction is proposed at MCB Hawaii Kaneohe Bay, the description of the affected environment for that location contains floodplain data.

3.3.1.1 MCB Hawaii Kaneohe Bay

Marine Waters

HAR 11-54, *Water Standards*, classifies Kāne'ohe Bay as marine water quality Class AA (DOH, 2021). Fresh water enters this portion of Kāne'ohe Bay from rainfall, intermittent small streams, and surface drainage from MCB Hawaii Kaneohe Bay. Water in this shallow area mixes slowly with deeper waters of the bay (Kāne'ohe Bay Information System, 2022). Freshwater mixing within the bay occurs more in the winter; during the summer, fresh water remains at the surface.

Groundwater

Groundwater results from the infiltration of water through surface soils and permeable rock materials. The Mōkapu Peninsula's thin layer of surface soil, combined with its layer of rock and sediments, provide little depth for groundwater drainage. Groundwater resources at Mōkapu Peninsula consist of an unconfined, low salinity caprock aquifer above a confined, freshwater basalt aquifer. There are no potable water wells on the base because the peninsula sits atop an area of brackish basal groundwater (Marine Corps, 2022).

Surface Water

Surface water resources generally consist of ponds, lakes, rivers, and streams. The affected area is located within the Koolau Poko watershed (a 65-square mile watershed subdivided into 19 sub-watersheds) and specifically within the Pu'u Hawai'iloa sub-watershed. Rainfall averages 40 inches per year (Rainfall Atlas of Hawai'i, 2023). There are no freshwater surface waters in the affected area. The Nu'upia Ponds Complex is an estuarine system near proposed construction, and Project 8 is immediately adjacent to Kāne'ohe Bay (see Figure 2-1). The affected area near the ponds complex collects and directs stormwater runoff from inland areas of Mōkapu Peninsula south to the Nu'upia Ponds Complex, ultimately connecting to Kāne'ohe Bay.

Wetlands

Eight protected wetland complexes are located at MCB Hawaii Kaneohe Bay: (1) Hale Koa Wetland; (2) Sag Harbor Wetland; (3) Salvage Yard Wetland; (4) Percolation Ditch Wetland; (5) Motor Pool Wetland; (6) Kāneʻohe Klipper Golf Course Ponds; (7) Temporary Lodging Facility Wetland; and (8) Nuʻupia Ponds Complex, a designated and protected Wildlife Management Area containing endangered flora and fauna. There are no wetlands located within the affected area; however, the Percolation Ditch Wetland and Motor Pool Wetland are adjacent to some of the proposed facilities' construction and renovation (see Figures 2-1 and 3.3-1). Ground-based training currently conducted at MCB Hawaii Kaneohe Bay adheres to MCB Hawaii Order 1500.9C, which specifically prohibits entering designated wetlands at MCB Hawaii Kaneohe Bay.

Floodplains

There are two types of flood-designated areas at MCB Hawaii Kaneohe Bay: flood zones designated by FEMA which are shown in Flood Insurance Rate Maps, and floodplains specific to the Mōkapu Central Drainage Channel. The affected area is in FEMA Zone D, an area where flood hazards are possible, but undetermined (Figure 3.3-1). Coastal regions adjacent to the affected area to the west and north are in FEMA Zones VE (1% or greater annual chance of coastal flooding and an additional hazard of storm waves), and AE (1% annual chance of flooding). Portions of the affected area are within the Extreme Tsunami Evacuation Zone.

Box culverts drain the runway area southward to Kāneʻohe Bay. Other box drains discharge runoff west of the runway to the ocean. The base main cantonment area east of the runway is drained by a series of pipe drain systems primarily to Kailua Bay. A narrow center portion of the base covering an area east of G Street to Craig Avenue is drained by a channel discharging southward into Kāneʻohe Bay. The east side of the base drains southward via pipe systems and a channel into the Nuʻupia Ponds.

3.3.1.2 MCTAB

MCTAB is in the Waimānalo watershed bounded by the Koolau Range to the southwest and the Aniani Nui–Waimānalo–Kaiwa Ridge lines to the northwest. Rainfall averages 40 inches per year (Rainfall Atlas of Hawaiʻi, 2023). The eastern boundary of MCTAB is bordered by Waimānalo Bay. There are two streams at MCTAB, Waimānalo (perennial) and Inoaole (intermittent). Both streams enter the ocean at Bellows Beach (Marine Corps, 2012). Much of the land at MCTAB is open with only a small percentage covered by buildings, roads, and runways. Stormwater runoff moves across impermeable hardstand in sheet flow to surrounding unpaved areas, where it either infiltrates into the soil or continues overland to streams, ponds, or natural depressions. Ground-based training currently conducted at MCTAB adheres to MCB Hawaii Order 1500.9C, which prohibits training near Waimānalo Stream.



Figure 3.3-1 Water Resources and Flood Zones at MCB Hawaii Kaneohe Bay

3.3.1.3 Pu'uloa RTF

Pu'uloa RTF is located within the Pearl Harbor watershed, a 110-square mile watershed subdivided into nine sub-watersheds. These sub-watersheds contain the headwaters of nine streams that drain into Pearl Harbor. The affected area is located within the Honouliuli sub-watershed of the Pearl Harbor watershed, the westernmost sub-watershed within the Pearl Harbor Watershed. Annual rainfall ranges from an average of 47 inches at the Waianae Mountain peaks to 24 inches near the H-1 Freeway. Pu'uloa RTF is in the coastal plain approximately 3.7 miles to the southwest of the Honouliuli stream. There are no surface waters or wetlands at Pu'uloa RTF (MCB Hawaii, 2019).

3.3.2 Environmental Consequences

This analysis focuses on the potential impacts of the proposed action on marine waters, groundwater, surface water, wetlands, and floodplains. No changes to the on- or off-base wastewater management systems would be required for the proposed action because there would be no change in the numbers of Marine Corps Hawaii personnel resulting from the proposed action. Groundwater analysis focuses on the potential for impacts to the quality, quantity, and accessibility of groundwater, and marine and surface water quality considers the potential for impacts to improve or degrade current water quality. The impact assessment of wetlands considers the potential for impacts to the hydrology, soils, and vegetation that support a wetland. The analysis of floodplains considers whether the project may impede the functions of floodplains and drainage systems in conveying floodwaters.

3.3.2.1 No-Action Alternative

Under the No-Action Alternative, the proposed action would not occur and there would be no change to water resources.

3.3.2.2 Facilities Alternatives

Preferred Facilities Locations

At MCB Hawaii Kaneohe Bay, the construction supporting the proposed action would occur in impervious and pervious undeveloped landscaped surface areas. Construction in previously undeveloped but landscaped areas would be on approximately 3 acres and would not directly disturb marine waters, groundwater, surface waters, or wetlands. Projects 2, 3, 5, and 7 are adjacent to the Percolation Ditch Wetland and Motor Pool Wetland (see Figures 2-1 and 3.3-1). There would be less than significant impacts to drinking water because there are no potable water wells on the base. MCB Hawaii Kaneohe Bay coordinates with the City and County of Honolulu Board of Water Supply regarding drinking water use. The proposed action would not introduce an increase in personnel, so there would be no change to potable water demand at the installation.

The proposed action would result in approximately 3 acres of new impervious surface area at the installation. This is a small change in impervious area at the installation representing less than a 1% increase in impervious areas on the installation. As required, all new facilities would implement LID elements and appropriate BMPs to maintain stormwater discharges to pre-development hydrologic conditions and the stormwater pollution control measures would comply with the installation NPDES MS4 permit. This small increase in impervious surface area would result in less than significant impacts to the amount and type of stormwater flow going into marine waters. The project design features in Table 2-4, including bioretention, vegetated swales, and pervious pavement, are designed to manage stormwater volumes to prevent any potential flooding or ponding at or near the affected area. In addition, the proposed construction would occur in compliance with the MCB Hawaii Kaneohe Bay MS4

permit (MCB Hawaii, 2023b), which includes authorized stormwater and non-stormwater discharges. The plan addresses stormwater runoff from industrial sites into Kāneʻohe Bay, Nuʻupia Ponds, Kailua Bay, and the Mōkapu Central Drainage Channel and identifies approved stormwater management procedures and design features consistent with DOH NPDES and USEPA Federal Facility Compliance Agreement requirements.

The new and renovated support facilities would include oil/water separators that are connected to the wastewater and stormwater system with a diverter valve to send flow to the appropriate system. Following oil separation and its storage in separate tanks, the remaining water is then discharged to the on-base wastewater treatment facility. These sites and the oil/water separator systems are subject to regular inspection and maintenance.

Coastal regions adjacent to the affected areas are in FEMA flood zones. Per EO 13690, it is the policy of the U.S. to improve the resilience of federal assets against the impacts of flooding. The proposed action would be designed to account for this increased flood risk potential.

The BMPs in Table 2-4 would manage stormwater volumes to minimize any potential flooding or ponding at or near the affected area. Construction staging areas would employ appropriate BMPs such as bioretention, vegetated swales, and/or vegetated filter strips as required during construction to reduce any temporary risk of increases in runoff and pollution. The affected area does not overlie a drinking water source and is not located near any freshwater surface waters.

Construction activities including site preparation, grading, grubbing, demolition of existing facilities, and utility trenching may indirectly result in soil erosion, sedimentation, and transport of pollutants with a potential to reach downstream waters. A Clean Water Act (CWA) NPDES Construction permit would be required for the proposed action, and would include a site-specific construction SWPPP, requiring the use of BMPs such as runoff detention basins and silt fencing to reduce the potential for soil, sediment, and pollutants to be transported off site. Additional BMPs for sediment control such as silt fences, storm drain inlet protection measures, sediment traps, and sediment basins would further reduce the risk of runoff. These same permit measures and BMPs would also minimize water quality effects associated with projects adjacent to the Percolation Ditch Wetland and Motor Pool Wetland (see Figures 2-1 and 3.3-1).

For these reasons, the preferred facilities locations would have less than significant impacts to water resources.

Alternate Facilities Locations

Under this alternative, alternate facilities locations would primarily involve reuse and renovation of existing facilities, and there would be minimal construction. Only Projects 2 and 3 would involve ground disturbance and construction. Project 2 construction would occur in a developed area and would only alter existing landscaped vegetation occurring in that area. Project 3 would involve the renovation, demolition, and construction of buildings in the 1/12 Gun Park, and there would be less ground disturbance than for the preferred facilities Project 3 construction components. Due to the minimal construction at alternate facilities locations, a NPDES permit would not be required. For the same reasons as the preferred alternative, construction activities at the alternate facilities locations would have less than significant impacts to water resources.

3.3.2.3 Operational Alternatives

Alternative 1

MCB Hawaii Kaneohe Bay

Application of BMPs described in Section 2.4 would minimize the potential for training impacts to water resources. Following construction at MCB Hawaii Kaneohe Bay, all stormwater runoff from training would be managed by the existing on-site storm drainage infrastructure. There are no freshwater surface waters or groundwater sources in the training areas, further reducing the possibility of any training impacts to water resources.

Proposed training with modernized equipment would be similar to the type and tempo for current training activities and would occur in the same locations that training with legacy equipment is currently conducted at MCB Hawaii Kaneohe Bay. No additional ground disturbance would occur at the training areas. Current training adheres to MCB Hawaii Order 1500.9C (see Section 2.1.3.2). This includes requirements designed to prevent activities that can affect marine water and freshwater resources. The Order provides specific guidance on procedures for disposing of trash or waste; avoiding draining oil, fuel, or hazardous materials onto the ground or water; avoiding use of detergents or chemicals for cleaning/maintaining vehicles and equipment; avoiding wetlands at MCB Hawaii Kaneohe Bay; and managing and reporting fuel or hazardous material incidents. Compliance with this Order would prevent contaminants from training with the modernized equipment from entering the marine environment, surface water, groundwater, or wetlands. Because the proposed action would not expand training or train outside of or differently than legacy training in existing areas, and the Marine Corps would continue to comply with MCB Hawaii Order 1500.9C procedures. Training with modernized equipment would not alter or affect stormwater runoff in the training areas or existing on-site storm drainage infrastructure. Therefore, Alternative 1 training would have less than significant impacts to water resources at MCB Hawaii Kaneohe Bay.

MCTAB

As with training on MCB Hawaii Kaneohe Bay, proposed training with modernized equipment at MCTAB would be similar to the type and tempo for current training activities and would occur in the same locations where training with legacy equipment is currently conducted. There are two freshwater streams located at MCTAB. Ground-based training does not and would not occur adjacent to these two streams and the proposed action does not include activities that directly or indirectly affect the streams. Modernized ground-based training would not occur in the marine environment and would follow the procedures identified in BMPs and MCB Hawaii Order 1500.9C. While there is a potential for any motorized vehicle/equipment to accidentally deposit fuel, oil, or lubricants, the Marine Corps has accident spill procedures in MCB Hawaii Order 1500.9C to prevent the contaminants from entering the marine or freshwater environment. For these reasons, Alternative 1 training would have less than significant impacts to water resources at MCTAB.

Pu'uloa RTF

Proposed training associated with modernized equipment at Pu'uloa RTF would be similar to the type and tempo for current ground-based training activities and would occur in the same locations where training with legacy equipment is currently conducted. The proposed action would not increase or change the level of small weapons or other training that currently occurs at Pu'uloa RTF. The description above for training with modernized equipment regarding the potential for effects to the marine and freshwater environment at MCTAB is the same for proposed training with modernized equipment at

Pu'uloa RTF. The Marine Corps would follow the same existing MCB Hawaii Order 1500.9C procedures for training with modernized equipment. Furthermore, there are no surface waters or wetlands at Pu'uloa RTF (MCB Hawaii, 2019). Therefore, there would be no change in the potential for contaminants affecting the marine and freshwater quality. For these reasons, Alternative 1 training would have less than significant impacts to water resources at Pu'uloa RTF.

Alternative 2

As identified previously, Alternative 2 would have additional ground equipment training events with the modernized equipment when compared with Alternative 1. This would increase the potential for effects to water resources associated with accidental spills or leaks. However, training would be identical to the type and tempo analyzed above for Alternative 1 and would continue to occur in the same locations that training with legacy equipment is currently conducted at MCB Hawaii Kaneohe Bay, MCTAB, and Pu'uloa RTF. No additional ground disturbance would occur at the training areas as it would occur at areas currently used for this type of training. The Marine Corps would continue to follow the same existing MCB Hawaii Order 1500.9C procedures for training with modernized equipment, resulting in a less than significant change in potential impacts to water quality. Furthermore, this increased tempo would occur in the same areas used for existing ground-based training and would not alter or affect stormwater runoff in the training areas or existing on-site storm drainage infrastructure. Therefore, while the increased activity slightly increases the potential for water resource effects to occur, the potential overall effects to water resources from an increased level of training would be managed on an individual case basis just as it is currently done for ground-based training at these locations, in accordance with MCB Hawaii Order 1500.9C procedures. For these reasons, Alternative 2 training would have less than significant impacts to water resources at MCB Hawaii Kaneohe Bay, MCTAB, and Pu'uloa RTF.

3.4 Cultural Resources

Cultural resources are the physical evidence or places of current and past human activity. Cultural resources can include historic properties that consist of buildings, structures, objects, districts, and sites that are listed in or eligible for listing in the NRHP. Cultural resources can also include Native American Graves Protection and Repatriation Act (NAGPRA) cultural items as defined in Section 3001 of title 25, U.S.C. (NAGPRA); Native Hawaiian sacred sites as defined in EO 13007, *Indian Sacred Sites*, May 24, 1996; archaeological resources as defined in section 470 aa-mm of Title 16, U.S.C. (Archaeological Resources Protection Act); archaeological artifact collections and associated records as defined in 36 CFR 79 (Curation of Federally Owned or Administered Archeological Collections); and DoD Instruction 4712.16.

3.4.1 Affected Environment

The affected environment for cultural resources is based on the area of potential effects (APE) of an NHPA Section 106 undertaking, through consultation with the SHPO. An APE is defined in 36 CFR Section 800.16(d) as “the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if any such properties exist.” The APE encompasses new construction; building demolitions; renovations and modifications; the locations of where new buildings or structures could potentially detract from the integrity of setting and feeling of cultural resources through visual, audible (noise), or atmospheric changes; and Marine Corps training areas where modernized equipment would be utilized. The construction portions of the APE include the preferred locations for facilities Projects 1, 2, 3, 4, 6, 7, and 8, and the alternate locations for facilities Projects 2 and 3. The location of the proposed facilities construction areas at MCB Hawaii Kaneohe Bay are shown in Figure 3.4-1. The training areas are at MCB Hawaii Kaneohe Bay, MCTAB, and Pu‘uloa RTF and are shown in Figures 1-3, 1-4, and 1-5.

There are no known NAGPRA cultural items located within the APE. No Native Hawaiian sacred sites have been identified within the APE during prior consultation with Native Hawaiian Organizations. There are no archaeological artifact collections and associated records curated within the APE.

Historic properties are known to be located within the APE. This analysis of cultural resources addresses two resource components of historic properties: archaeology and architecture. Archaeological resources are generally sites where human activity measurably altered the earth and/or left deposits of physical remains, and architectural resources include standing buildings, structures, and other built-environment resources of historic or aesthetic significance. Archaeological and architectural resources can be grouped together to comprise a district or landscape.

3.4.1.1 Historical Background

Detailed historical backgrounds for MCB Hawaii Kaneohe Bay, MCTAB, and Pu‘uloa RTF are found in the MCB Hawaii ICRMP (Tomonari-Tuggle and Clark, 2021) in Appendix C.

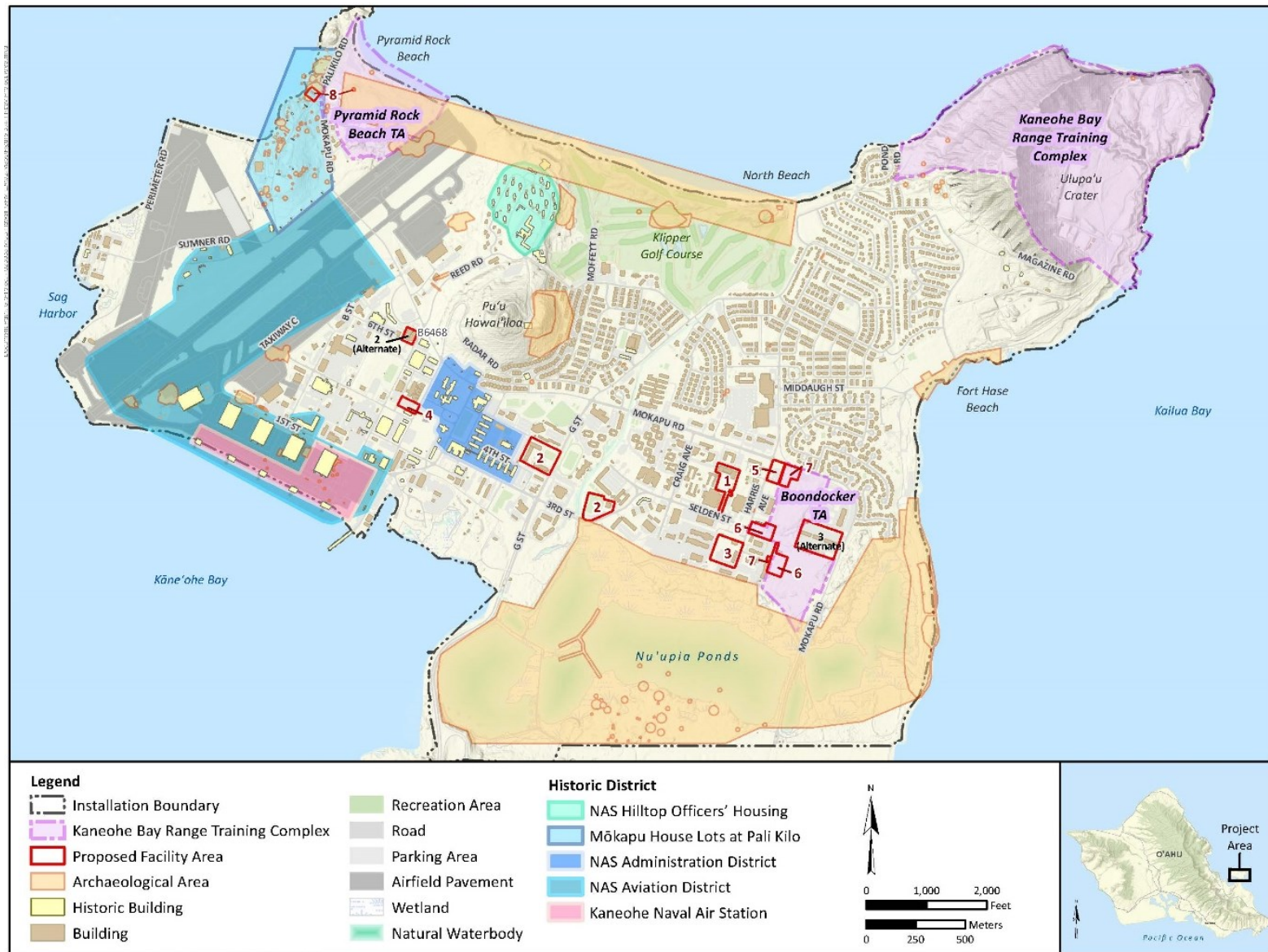


Figure 3.4-1 Cultural Resources and Project Facilities Construction Areas Located at MCB Hawaii Kaneohe Bay

3.4.1.2 Archaeological Resources

MCB Hawaii has conducted numerous inventories of cultural resources at MCB Hawaii Kaneohe Bay, MCTAB, and Pu'uloa RTF, identifying properties and determining their eligibility for listing in the NRHP. The results of these studies are summarized in MCB Hawaii's *Integrated Cultural Resources Management Plan* (Tomonari-Tuggle and Clark, 2021), and *Cultural Landscape Report* (MCB Hawaii, 2018). Table 3.4-1 summarizes the cultural resources within the affected area. Archaeological testing in accordance with the Revised Work Plan was conducted for all proposed construction locations to provide project-specific information on archaeological resources (NAVFAC Pacific, 2023). An isolated subsurface remnant likely representing a discontinuous extension of previously identified Hawai'i State Inventory of Historic Places (SIHP) Site 50-80-11-5733 was identified within the Project 8 G/ATOR warehouse location. The cultural deposit consisted of basalt artifacts, metal fragments, glass and ceramic fragments, charcoal, and traditional midden (Leppard 2024). The Marine Corps works with SHPO whenever ground-disturbing activities occur on MCB Hawaii to develop appropriate archaeological monitoring and reporting requirements.

Table 3.4-1 Archaeological Resources in the APE

<i>SIHP Site No.</i> <i>50-80-11-</i>	<i>District/ Area</i>	<i>Period¹</i>	<i>Site Description</i>	<i>NRHP Status²</i> <i>(Significance Criterion)³</i>	<i>Location</i>
MCB Hawaii Kaneohe Bay					
0366	N/A	TH	Lu-o-Wai-o-Kanaloa (Brackish well, possibly buried beneath Runway 4/22).	Not located; Not evaluated	Pyramid Rock Beach Training Area
0367	Mōkapu House Lots Archaeological District at Pali Kilo	TH	Hina Stone; boulder; a fishing shrine, a fish trap (Pa Ohua), and shrine with two stones representing Ku and Hina	R-yes (B, C, D)	Adjacent to Preferred 8
1017	N/A	TH	MBA, including Burial Site H	NRHP Listed (C, D)	Within/adjacent to Preferred 8
4626	N/A	TH	Modified outcrop	R-yes (D)	Kaneohe Bay Range Training Complex
4891	N/A	TH	Subsurface cultural deposit	R-yes (D)	Pyramid Rock Beach Training Area
5733	Mōkapu House Lots Archaeological District at Pali Kilo	TH, NM	Subsurface cultural deposits and 20th century house foundations	R-yes (D)	Within Project 8 G/ATOR Warehouse Location
7724	Mōkapu House Lots Archaeological District at Pali Kilo	TH	Disturbed subsurface cultural deposit	R-yes (C, D)	Adjacent to Preferred 8
7725	Mōkapu House Lots Archaeological District at Pali Kilo	NM	Retaining wall	R-yes (C,D)	Adjacent to Preferred 8
MCTAB					
511	Bellows Field Archaeology Area	TH	Area of habitation and burials	NRHP-Listed (D)	MCTAB

<i>SIHP Site No. 50-80-11-</i>	<i>District/ Area</i>	<i>Period¹</i>	<i>Site Description</i>	<i>NRHP Status² (Significance Criterion)³</i>	<i>Location</i>
3309	Waimānalo Archaeological District (Noncontributing)	NM	Agricultural water catchment system	NRHP-Eligible (D)	MCTAB
3311	Waimānalo Archaeological District (Noncontributing)	NM	Irrigation ditch	NRHP-Eligible (D)	MCTAB
3312	Waimānalo Archaeological District (Noncontributing)	NM	Waimānalo Japanese Cemetery	NRHP-Eligible (A, D)	MCTAB
4850	Waimānalo Archaeological District	TH	Discontinuous subsurface cultural deposit near and may extend into MCTAB.	NRHP-Eligible (D)	MCTAB
4851	Waimānalo Archaeological District	TH	Pre-Contact and post- Contact subsurface deposits, 15+ intact burials.	NRHP-Eligible (D)	MCTAB
4852	N/A	TH	Subsurface deposits outside of MCTAB, includes the Bellows Dune Site (O18); three areas of excavation.	NRHP Listed	MCTAB
4853	Waimānalo Archaeological District	TH	Subsurface cultural deposits, possibly contains burials.	NRHP-Eligible (D)	MCTAB
4858	Waimānalo Archaeological District	TH	Stone structures, lithic scatter, subsurface deposits, possibly burials.	NRHP-Eligible (D)	MCTAB
4861	N/A	M	Concrete foundation, artifact scatter	Not evaluated	MCTAB
Pu'uloa RTF					
N/A	N/A	TH	Area of limestone sinkholes	Not evaluated	Pu'uloa RTF

Notes: ¹Probable period of use: TH=traditional Hawaiian pre-Contact/19th century; NM=non-military 19th/20th century; M=military 20th century

²Status of nomination to the NRHP:

NRHP-listed=Listed in the NRHP

NRHP-eligible= determined eligible for NRHP with SHPO concurrence

Not eligible = determined not eligible for the NRHP with SHPO concurrence

R=yes=recommended eligible for the NRHP, SHPO concurrence not yet received

Not evaluated= no eligibility recommendation has been made to date

³NRHP significance criteria:

A=associated with events that have made a significant contribution to the broad patterns of our history;

B=associated with the lives of persons significant in our past;

C=embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction;

D=yielded, or may be likely to yield, information important in prehistory or history

Legend: MBA = Mōkapu Burial Area; MCB = Marine Corps Base; MCTAB = Marine Corps Training Area Bellows; N/A = Not Applicable; NRHP = National Register of Historic Places; RTF = Range Training Facility; SIHP = Hawai'i State Inventory of Historic Places.

MCB Hawaii Kaneohe Bay

There have been more than 240 cultural resource projects undertaken at MCB Hawaii Kaneohe Bay. These projects include archaeological surveys, inventories, monitoring, historical architectural inventories and documentation, cultural landscape reporting, and historical and interpretative projects. See Figure 3.4-1 for generalized locations of archaeological resources. Through the results of these studies, Cultural Resource Management Zones (CRMZs) and a model of archaeological sensitivity (Tomonari-Tuggle and Clark, 2021:II–86) have been developed. Within each CRMZ, archaeological sensitivity varies based on: (1) an analysis of known site distribution combined with the study of historical settlement/land use and environmental factors to develop a model of pre-contact and early historic settlement patterns; (2) historic and modern development that would have affected site preservation (e.g., landfills, areas where sand has been mined and/or used as fill, dredged areas, ordnance target areas); and (3) areas that have been previously investigated and found to not contain archaeological sites (Tomonari-Tuggle and Clark, 2021). Figure 3.4-2 depicts the MCB Hawaii Kaneohe Bay archaeological sensitivity map.

In addition to known archaeological resources and the modeled archaeological sensitivity, disturbed human remains have been found in redeposited sand fill at various and random locations throughout the peninsula. In the 1930s and during World War II (WWII), sand was mined from the northern dunes (the MBA) and human remains were unknowingly transported with the fill sand. This fill typically occurred in utility trenches, under and around building foundations and concrete pads, and has been found in secondary disturbed contexts at the north end of the airfield. For this reason, MCB Hawaii has consistently required monitoring of ground-disturbing activities to identify any presence of human skeletal remains and ensure any encountered are treated under conditions agreed upon with Native Hawaiian descendants and organizations (Tomonari-Tuggle and Clark, 2021).

Preferred Facilities Project Locations

The affected areas for the preferred alternatives for facilities Projects 1, 2, 3, 4, 6, 7, and 8 are located adjacent to or within the boundaries of known archaeological resources (see Figure 3.4-1 and Table 3.4-1).

Nu‘upia Pond, which is part of the Mōkapu Peninsula Fishpond Complex (SIHP Site No. 50-80-11-1002), is located near the affected areas for Projects 2, 3, 6, and 7 (see Figure 3.4-1 and Table 3.4-1). Although none of these projects would occur within the known boundaries of the site, prior archaeological testing and monitoring identified buried fishpond sediments associated with the site within 200 feet south of Project 3 location (Tomonari-Tuggle and Clark, 2021). This suggests the fishpond may have extended farther north than the currently recognized boundary and that there could be buried archaeological resources associated with the fishpond on or near its northern boundary.

Five archaeological resources are located adjacent to Project 8 (see Table 3.4-1). Four of these are contributing elements to the Mōkapu House Lots, which are near the proposed G/ATOR Climate Controlled Warehouse component of Project 8. The fifth resource is the MBA (SIHP Site 50-80-11-1017); the proposed G/ATOR pad is within the boundaries of this site. Archaeological testing at the Project 8 G/ATOR warehouse location identified an isolated extension of SIHP Site 50-80-11-5733, a Traditional Hawaiian pre-Contact/19th–20th century buried site eligible for listing in the NRHP.

There are no known archaeological resources within or adjacent to the affected areas for the preferred alternatives for Projects 1, 4, and 5.

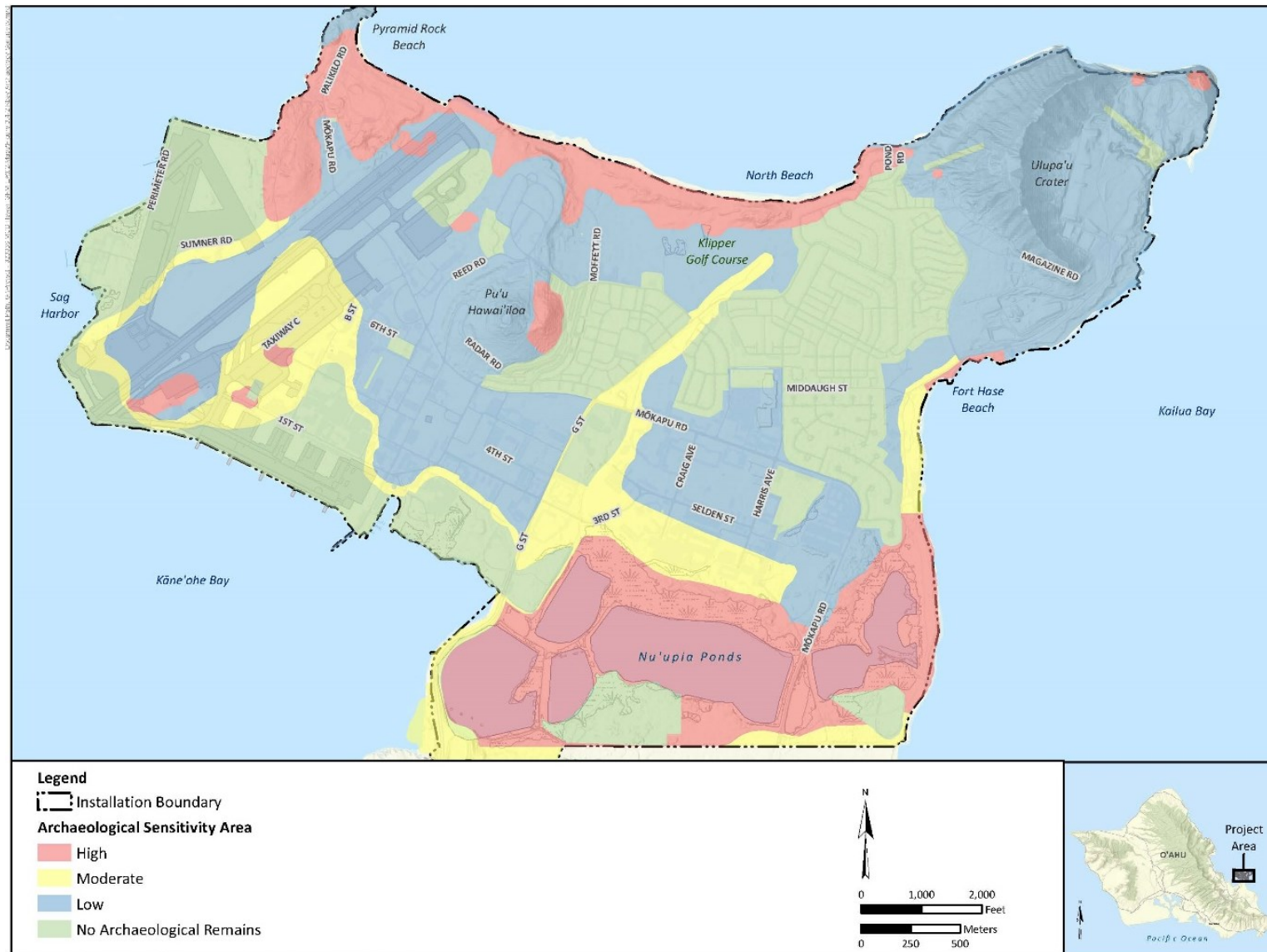


Figure 3.4-2 Archaeological Sensitivity Areas at MCB Hawaii Kaneohe Bay

Alternative Facilities Locations

There are no known archaeological resources within or adjacent to the locations of alternate facilities Projects 2 or 3.

MCTAB

Archaeological resources located within MCTAB include features of the NRHP-listed Bellows Airfield Archaeological Area, four traditional Hawaiian period sites that are contributing elements to the Waimānalo Archaeological District, one individual traditional Hawaiian period sites (including deposits of the Bellows Dune Site O-18 that may extend into MCTAB), three non-military historic period sites that are non-contributing elements of the Waimānalo Archaeological District, and two military Historic period sites (see Table 3.4-1; Figure 3.4-3; Tomonari-Tuggle and Clark, 2021). The archaeological sensitivity for MCTAB is shown in Figure 3.4-4.

Pu'uloa RTF

Archaeological resources at Pu'uloa RTF are limited to one area of archaeological interest (see Table 3.4-1) that has been noted but not formally documented. The area of archaeological interest is an area of limestone sinkholes noted by Tuggle (1984), Tuggle and Wilcox (1998), and Tomonari-Tuggle and Clark (2021). The area of archaeological interest is not located within the established training area at Pu'uloa RTF. The archaeological sensitivity map for Pu'uloa RTF is shown in Figure 3.4-5.

3.4.1.3 Architectural Resources

Architectural resources located within or near the APE are listed in Table 3.4-2. These resources include buildings, structures, and objects that are listed or eligible for listing in the NRHP. These resources are summarized by location below.

MCB Hawaii Kaneohe Bay

Architectural resources at MCB Hawaii Kaneohe Bay include individual buildings and structures that are eligible for or listed in the NRHP, as well as buildings and structures located within the Naval Air Station (NAS) Kaneohe Bay Administration District (Tomonari-Tuggle and Clark, 2021). Additionally, a cultural landscape report (MCB Hawaii, 2018) identified architectural resources throughout the installation as contributors to the historic character of MCB Hawaii Kaneohe Bay.

Architectural resources located within or near the proposed facilities are listed in Table 3.4-2 and depicted on Figures 3.4-6 through 3.4-8. One architectural resource determined eligible for listing in the NRHP, a storage shed (Building 3039), is located in the MCB Hawaii Kaneohe Bay RTF (see Table 3.4-2 and Figure 3.4-8). However, Building 3039 has been previously proposed for demolition and included in the Memorandum of Agreement regarding Demolition of Three Historic Buildings at MCB Hawaii Kaneohe Bay, signed October 15, 2020.

MCTAB

There are five architectural resources eligible for the NRHP within the MCTAB affected area (see Table 3.4-2 and Figure 3.4-9). These include two WWII-era revetment complexes, two Cold War-era buildings, and coastal defense structures (defense battery groups) that comprise part of the MCTAB Cultural Landscape.

Pu'uloa RTF

Three architectural resources constructed in 1942 have been determined eligible for the NRHP within the Pu'uloa RTF affected areas (see Table 3-4.2; Figure 3.4-10). These include a Type D Casualty Station, a Splinter-proof Air Raid Shelter, and a group of three concrete bunkers.

3.4.2 Environmental Consequences

NEPA incorporates NHPA analysis of historic properties as part of the overall evaluation of environmental consequences and also addresses environmental impacts to all other categories of cultural resources. NEPA and NHPA are separate statutes that evaluate and address impacts differently. For example, effects of a proposed action on a historic property can be “adverse” under the NHPA Section 106 without triggering a determination of “significance” under NEPA, and a proposed action that has been determined to result in no adverse effects to historic properties under NHPA Section 106 of the NHPA can rise to the level of “significance” under NEPA for factors other than impacts to historical resources.

The analysis of potential effects on historic properties is based on the following considerations: (1) physically altering, damaging, or destroying all or part of a property; (2) altering characteristics of the surrounding environment that contribute to property significance; (3) introducing visual, audible, or atmospheric elements that are out of character with the property or alter its setting; or (4) neglecting the property to the extent it deteriorates or is destroyed. In the case of the proposed action, potential effects to historic properties could result from damage caused by ground-disturbing activities associated with facility construction, demolition, or modification, as well as the introduction of new buildings or structures that could detract from the integrity of the setting or feeling of a historic property through visual, audible (noise), or atmospheric changes due to project implementation.

Under Section 106, adverse effects to historic properties must be resolved through measures that avoid, minimize, or mitigate the effects. Under NEPA, potential impacts can be mitigated through avoiding, minimizing, or reducing impacts, as well as compensating for impacts to the human environment. Mitigation of impacts to cultural resources, including historic properties as required by Section 106 and NEPA, can reduce those impacts below the threshold of concern for NEPA.

The SHPO concurred with the Marine Corps' no adverse effect determination for the proposed action in May 2024 based on the Marine Corps agreeing to the following mitigation measures to avoid impacts to SIHP Sites 50-80-11-1017 or 50-80-11-5733: the proposed facility in Project 8 will avoid the isolated archaeological deposit in trench T8-5; the project will adhere to excavation restrictions, limiting ground disturbance to a depth of 50 centimeters below surface in the vicinity of the known isolated deposit in trench T8-5; archaeological monitoring will be conducted by a Secretary of the Interior-qualified archaeologist for all ground disturbing activities within the Project 8 footprint; and an Archaeological Monitoring Plan will be submitted to the SHPO for review and approval prior to the start of Project 8.

3.4.2.1 No-Action Alternative

Under the No-Action Alternative, the proposed action would not occur and there would be no change to cultural resources.

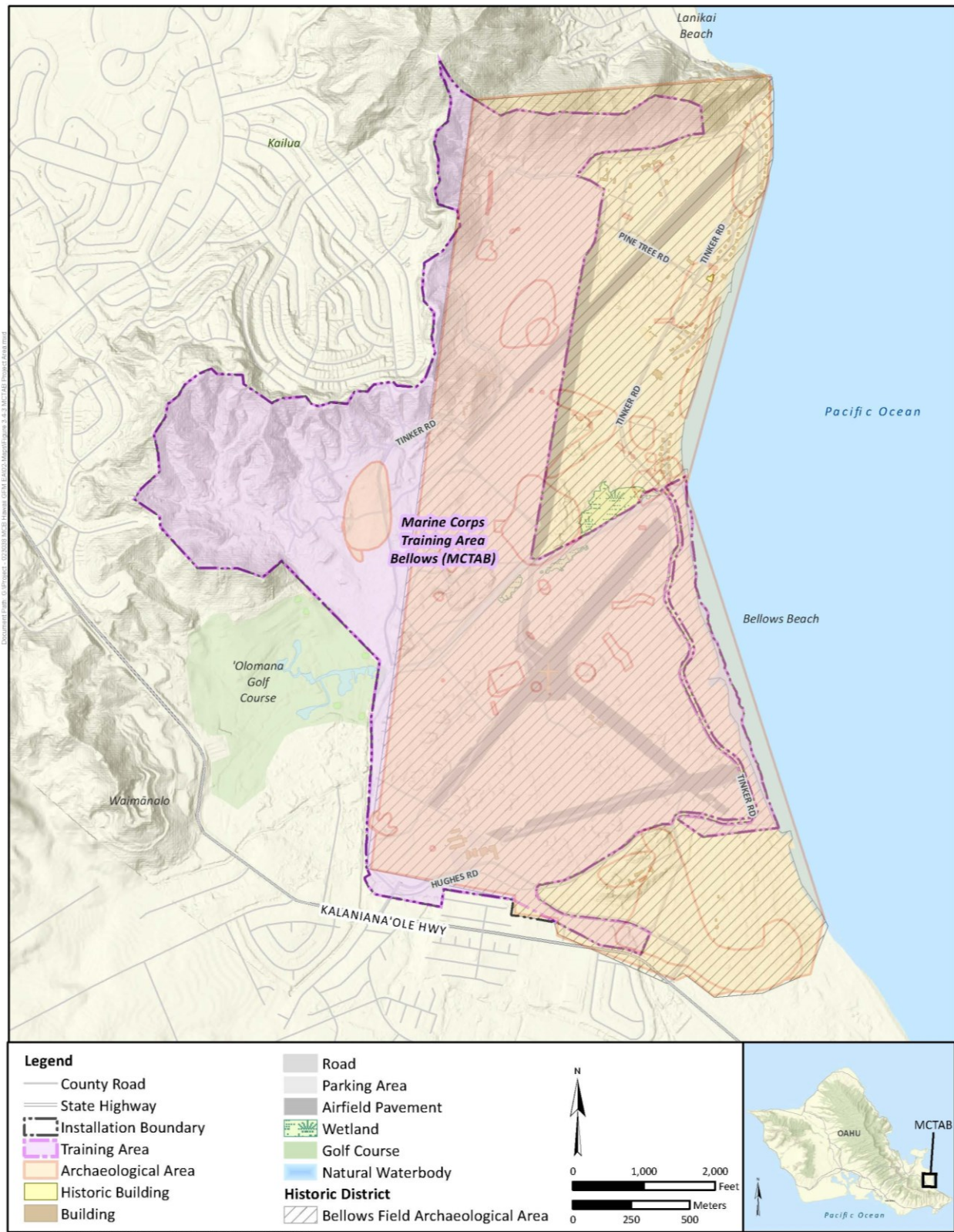


Figure 3.4-3 Cultural Resources at MCTAB

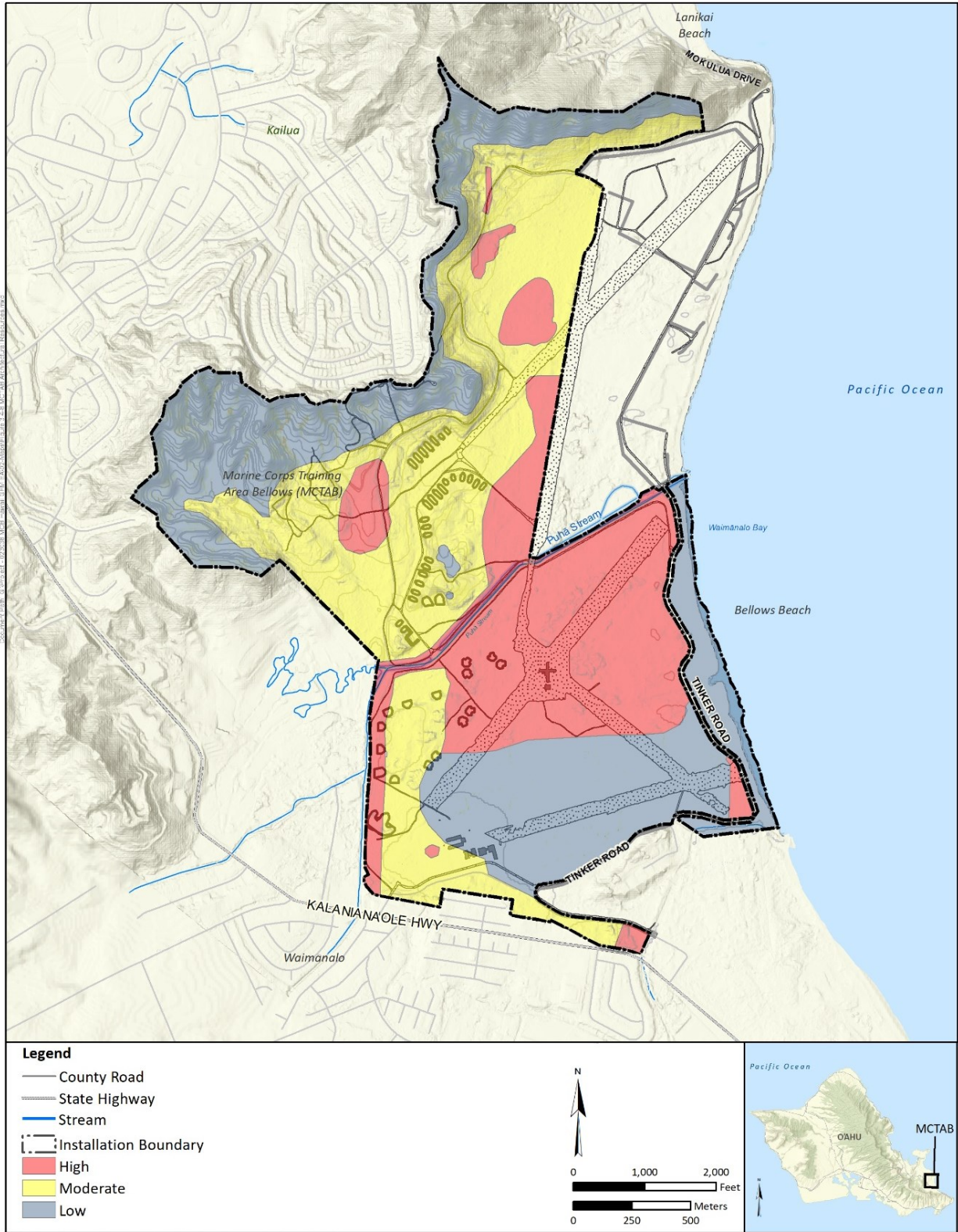


Figure 3.4-4 Archaeological Sensitivity Areas at MCTAB



Figure 3.4-5 Archaeological Sensitivity Areas at Pu'uloa RTF

Table 3.4-2 Architectural Resources in the APE

<i>Name/ Building #</i>	<i>Year Built</i>	<i>NRHP Status¹ (Significance Criterion)²</i>	<i>Potential Impacts</i>
MCB Hawaii Kaneohe Bay			
NAS Kaneohe Bay Administration District	WWII	NRHP-eligible (A)	No impacts from preferred facilities Projects 2 and 4
Storage Shed (HQ BN [Training])/ 3039	1943	NRHP-eligible (A)	Potential physical impacts from training
MCTAB			
Revetments/ no #	Pre-1944	NRHP-eligible (A, C)	Potential physical impacts from training
Concrete bunkers and bomb dispersal revetments (Site 4860)/ no #	Pre-WWII	NRHP-eligible (A, D, and possibly C)	Potential physical impacts from training
Transmitter Building/700A	1957	NRHP-eligible (A, C)	Potential physical impacts from training
Ready Power Building/701	1957	NRHP-eligible (A, C)	Potential physical impacts from training
Coastal Defense Structures	WWII	NRHP-eligible (A, C)	Potential physical impacts from training
Pu'uloa RTF			
Type D Casualty Station/48	1942	NRHP-eligible (A, C)	Potential physical impacts from training
Splinterproof Air Raid Shelter/ 136	1940	NRHP-eligible (A, C)	Potential physical impacts from training
Three concrete bunkers/ no #	1942	NRHP-eligible (Criteria not specified in prior documentation)	Potential physical impacts from training

Notes: ¹Status of nomination to the NRHP:

NRHP-eligible= determined eligible for NRHP with SHPO concurrence

²NRHP significance criteria:

A=associated with events that have made a significant contribution to the broad patterns of our history.

C=embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.

D=yielded, or may be likely to yield, information important in prehistory or history.

Legend: # = number; BEQ = Bachelor Enlisted Quarters; BN = Battalion; HQ = Headquarters; MCB = Marine Corps Base; MCTAB = Marine Corps Training Area Bellows; N/A = Not Applicable; NAS = Naval Air Station; NRHP = National Register of Historic Places; RTF = Range Training Facility.

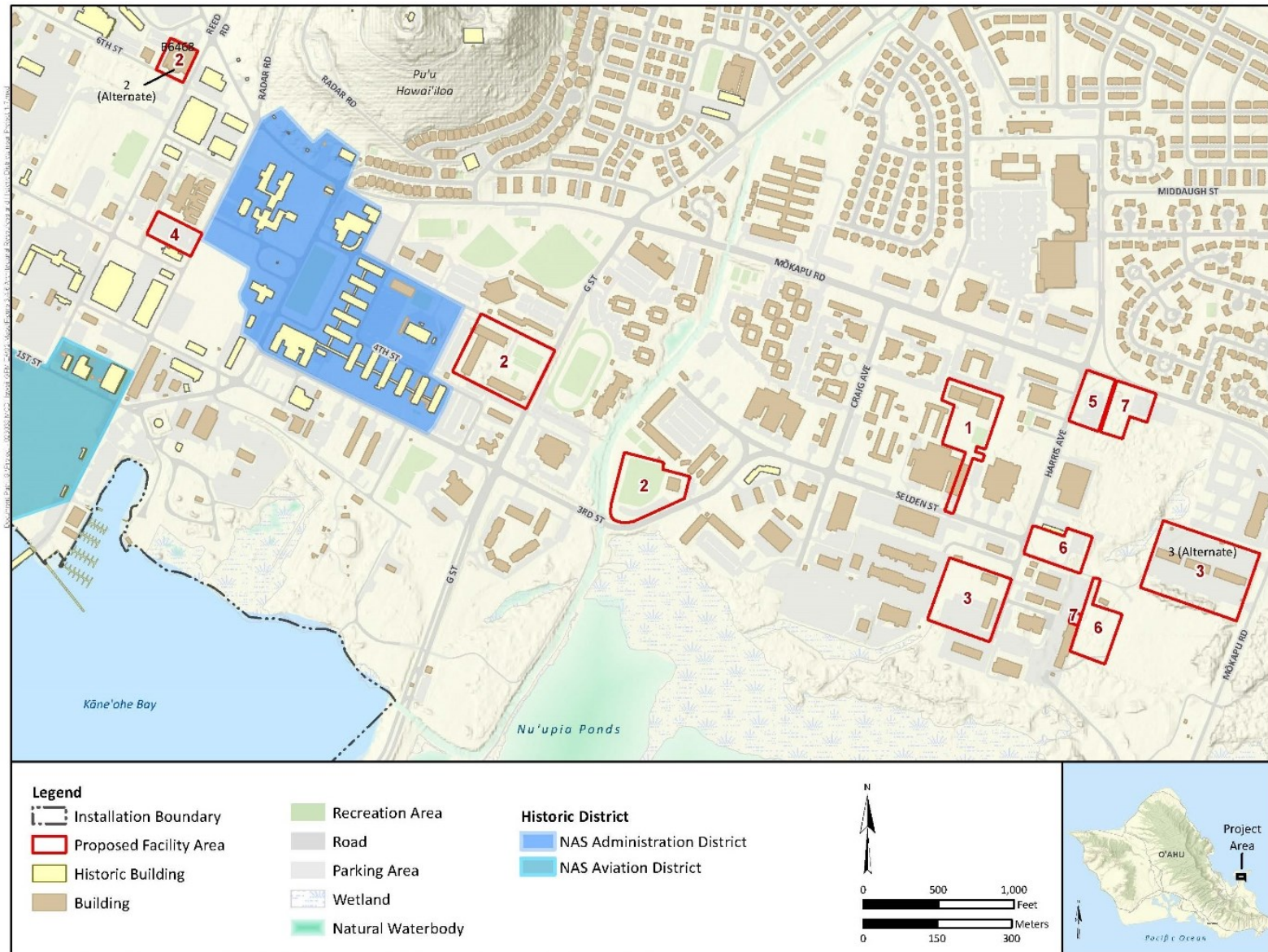


Figure 3.4-6 Architectural Resources and Historic Districts near Projects 1 through 7 at MCB Hawaii Kaneohe Bay

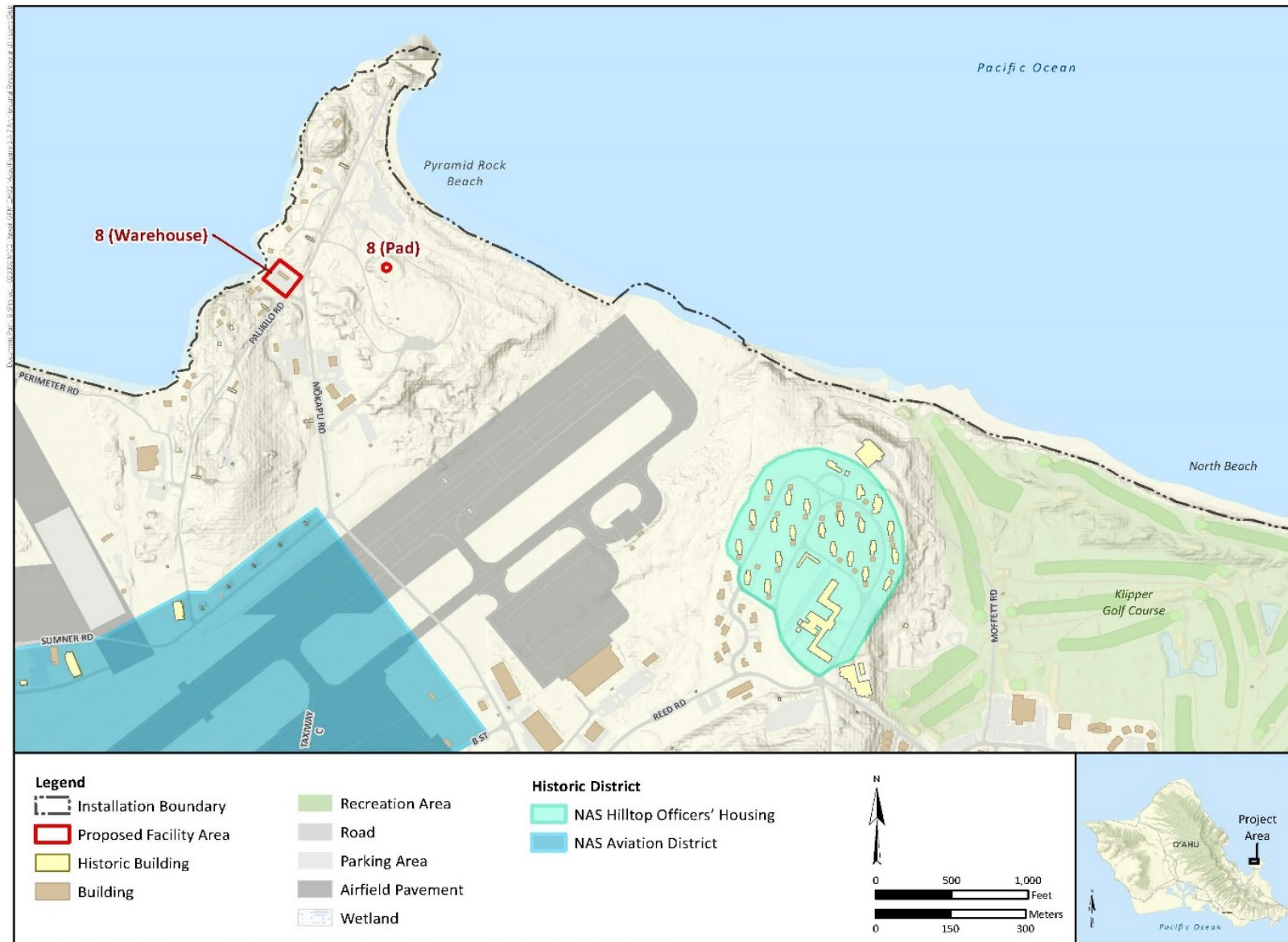


Figure 3.4-7 Architectural Resources and Historic Districts near Project 8 at MCB Hawaii Kaneohe Bay

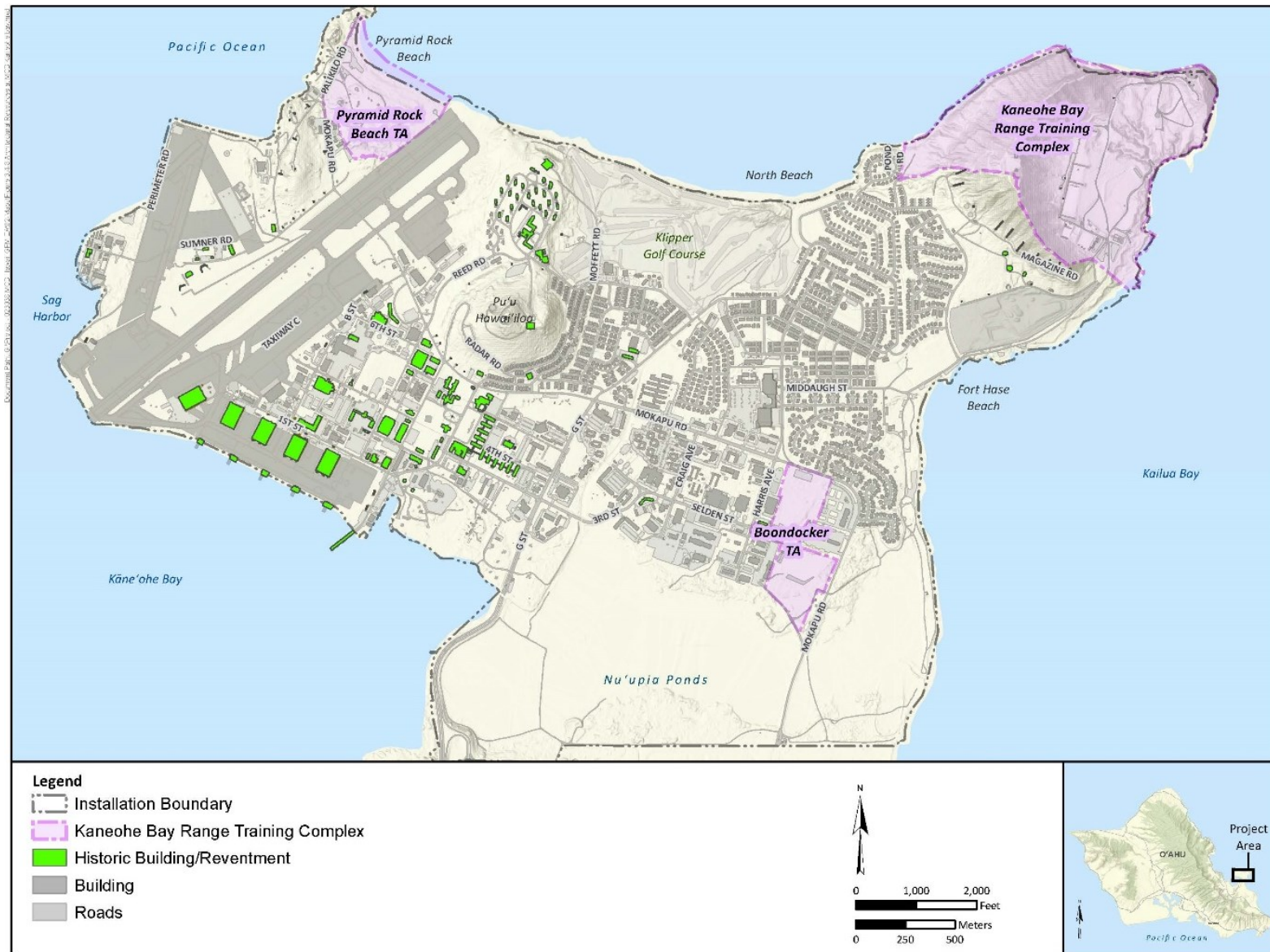


Figure 3.4-8 Architectural Resources at MCB Hawaii Kaneohe Bay Training Areas

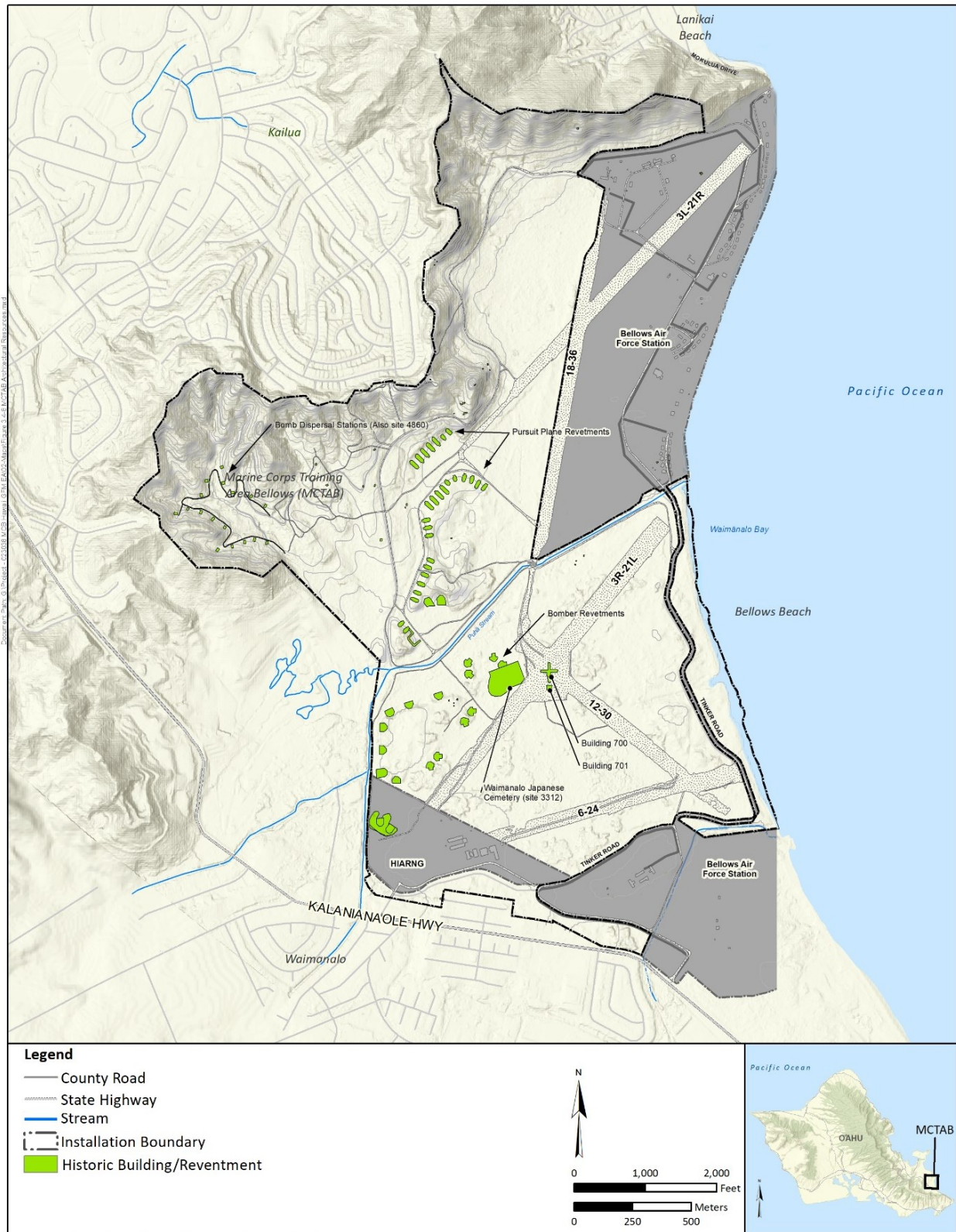


Figure 3.4-9 Architectural Resources at MCTAB



Figure 3.4-10 Architectural Resources at Pu'uloa RTF

3.4.2.2 Facilities Alternatives

Preferred Facilities Locations

Archaeological Resources

Construction projects at the preferred facilities locations include the following activity types: demolishing existing buildings and structures, constructing new buildings and structures, modifying/renovating buildings, repaving, adding fencing, installing underground utilities within the construction footprints, and staging construction equipment.

For all construction activities, with the exception of Project 8, no known archeological features are present in the construction areas. Archaeological monitoring would occur during project-related ground-disturbing activities as a BMP consistent with SOP 3 for Work in Archaeologically Sensitive Areas at MCB Hawaii. The monitoring would be performed in accordance with an archaeological monitoring work plan that would be reviewed and approved by the MCB Hawaii Cultural Resource Manager. This would incorporate requirements of the NAGPRA and applicable SOPs described in the 2021 MCB Hawaii ICRMP (Tomonari-Tuggle and Clark, 2021). Monitoring would consist of identification, evaluation, collection, recording, analysis, and reporting of any archaeological remains identified during ground-disturbing activities. Any archaeological resources identified would be considered post-review discoveries under NHPA Section 106, and actions to mitigate effects to those resources would be developed in accordance with 36 CFR 800.13.

The G/ATOR Pad portion of Project 8 would reuse an existing non-historic concrete pad located within the boundaries of the MBA (SIHP Site 50-80-1017) without involving ground disturbance or otherwise altering its immediate surroundings. In addition, the G/ATOR Climate Controlled Warehouse portion of Project 8 will be designed to avoid physically impacting the isolated extension of SIHP Site 50-80-11-5733 that is located in the project area. In consultation with the Hawaii SHPO, the proposed facility in Project 8 will avoid the isolated archaeological deposit in trench T8-5 during the project siting and planning phase. The project would adhere to excavation restrictions, limiting ground disturbance to a depth of 50 centimeters below surface in the vicinity of the known isolated deposit in T8-5.

Archaeological monitoring will be conducted by a Secretary of the Interior-qualified archaeologist for all ground disturbing activities within the Project 8 footprint. An Archaeological Monitoring Plan will be submitted to the SHPO for review and approval prior to the start of this project. Thus, Project 8 would avoid impacts to SIHP Sites 50-80-11-1017 or 50-80-11-5733.

For these reasons, construction projects at the preferred facilities locations would have less than significant impacts to archaeological resources at MCB Hawaii Kaneohe Bay.

Architectural Resources

No architectural resources would be impacted by the construction projects at the preferred facilities.

Therefore, construction projects at the preferred facilities locations would have no impacts to architectural resources at MCB Hawaii Kaneohe Bay.

Alternate Facilities Locations

Archaeological Resources

This alternative proposes construction at only two locations: ground disturbance and construction at the alternate Project 2; and the renovation, demolition, and construction of buildings at the alternate Project 3 location. Archaeological testing at this location conducted prior to the construction of the

existing Building 6468 identified no archaeological resources (Tomonari-Tuggle and Clark, 2021). Archaeological testing is being conducted at the alternate Project 3 location in accordance with the Revised Final Work Plan (NAVFAC Pacific, 2023).

For all construction activities, archaeological monitoring would occur during project-related ground-disturbing activities as a BMP as described above for the preferred facilities project locations, and any archaeological resources identified would be considered post-review discoveries under NHPA Section 106. Actions to mitigate effects to those resources would be developed in accordance with the MCB Hawaii ICRMP (Tomonari-Tuggle and Clark, 2021) and 36 CFR 800.13.

For these reasons, construction projects at the alternate facilities locations would have less than significant impacts to archaeological resources at MCB Hawaii Kaneohe Bay.

Architectural Resources

The alternate facilities locations do not contain architectural resources, nor are they located within historic districts. Therefore, construction projects at the preferred facilities locations would have no impacts to architectural resources at MCB Hawaii Kaneohe Bay.

3.4.2.3 Operational Alternatives

Alternative 1

Training with the modernized equipment would occur in the same locations and be at the same type and tempo as current ground-based training with legacy equipment. The Marine Corps currently conducts ground-based training at MCB Hawaii Kaneohe Bay, MCTAB, and Pu'uloa RTF (see Section 2.1.3, *Training*). MCB Hawaii manages potential impacts to cultural resources from these activities through procedures established per MCB Hawaii Order 1500.9C and the 2021 MCB Hawaii ICRMP (Tomonari-Tuggle and Clark, 2021). Chapter 2 of this order includes specifications for identification of cultural and natural resource constraints, and identification of off-limits areas and prohibited activities. Specific actions carried out during all training to reduce impacts to cultural resources include:

- The enforcement of federal and state historic preservation laws.
- Confinement of activities to training area boundaries.
- Prohibition of digging or other ground disturbance deeper than 6 inches below the existing surface, including the removal of sand from beaches or shoreline.
- Establishment of off-limits areas that include areas of historical significance.
- Prohibition of the removal or intentional destruction of archaeological materials or artifacts or the disturbance of any archaeological site.
- Absolute prohibition of ground disturbance within or around the Pyramid Rock Training Area MOUT (within the MBA).

The proposed training would continue to adhere to these restrictions and would only occur on existing ranges and range areas, established vehicle paths, and areas already approved for training. Additionally, the modernized equipment may present a decreased risk of impacting archaeological resources within these already approved areas because it consists of wheeled vehicles that, in some instances, are smaller than the equipment it would replace, which would result in less ground disturbance while in use. Vibrational effects from wheeled-vehicle training activities are not currently known to be impacting cultural resources in the training areas.

As noted in prior resource sections, the modernized equipment, training type and tempo, and location of training events would be similar to existing training with legacy equipment and would comply with MCB Hawaii Order 1500.9C and the MCB Hawaii ICRMP, including the restrictions listed above. The modernized equipment itself poses a reduced risk to cultural resources compared to existing equipment. As a result, there is no element of the proposed training that would alter, degrade, or adversely affect archaeological resources (see Table 3.4.1) or architectural resources (see Table 3.4.2) at these training areas. Therefore, Alternative 1 training at MCB Hawaii Kaneohe Bay would have less than significant impacts to cultural resources.

Alternative 2

This alternative includes the same proposed training with modernized equipment as identified in Section 2.1.3 and would be identical to training types and locations described above for Alternative 1, but with increased ground equipment training events. As with the current training with legacy equipment, the Alternative 2 training would be performed under the same restrictions established in MCB Hawaii Order 1500.9C and the procedures described in the MCB Hawaii ICRMP (Tomonari-Tuggle and Clark, 2021). These restrictions would, as with Alternative 1, result in no adverse effects to all archaeological resources (see Table 3.4.1) and no impacts to architectural resources (see Table 3.4.2) during the training. Because adverse effects to cultural resources would be avoided, the increased tempo of Alternative 2 training would result in no impacts. Therefore, Alternative 2 training would have less than significant impacts to cultural resources.

3.5 Terrestrial Biological Resources

Terrestrial biological resources include native and introduced plant and animal species and their habitats. This analysis focuses on species that are important to the function of ecosystems or are protected under federal or state law at MCB Hawaii Kaneohe Bay, MCTAB, and Pu'uloa RTF. Biological resources are divided into the following categories: *Vegetation*, *Wildlife*, and *Special-status Species*.

- *Vegetation*: Potential project-related effects to existing vegetation may be caused by removal of vegetation during construction, disturbance from vehicle and foot traffic, and indirect sources such as changes to stormwater volumes and pollutant loads.
- *Wildlife*: Potential stressors to wildlife habitat may include those described above for vegetation and lighting related to construction and training, nesting/breeding season disturbance, potential wildlife-vehicle strikes, and changes in the noise environment during construction and training. Special consideration is given to bird species protected under the Migratory Bird Treaty Act (MBTA) and EO 13186, *Responsibilities of Federal Agencies to Protect Migratory Birds*.
- *Special-status Species* are defined in this EA as species that are listed, have been proposed for listing, or are candidates for listing as threatened or endangered under the ESA and other species of concern as recognized by state or federal agencies. Stressors for special-status species are similar to those described above for vegetation and wildlife but can vary by species (see impact analysis for Special-status Species in Section 3.5.2).

The affected environment for biological resources includes the affected areas at MCB Hawaii Kaneohe Bay, MCTAB, and Pu'uloa RTF that may experience direct and indirect noise, visual, and other physical impacts from the proposed action. When analyzing impacts to vegetation, only facility infrastructure and training areas are considered since effects would be limited to those areas that may be physically disturbed by the proposed action.

The Marine Corps prepared a Final Biological Assessment (Appendix D) to initiate informal consultation with USFWS, Pacific Islands Office, under Section 7 of the ESA. With the adoption of measures included in Table 2-4 of the EA, the USFWS concurred with the Marine Corps determination that the preferred facilities construction component and Alternative 1 training would have no effect or may affect, but is not likely to adversely affect, ESA-listed species at MCB Hawaii Kaneohe Bay, MCTAB, and Pu'uloa RTF (Appendix D).

3.5.1 Affected Environment

The affected environment section below describes the existing conditions for vegetation and wildlife at MCB Hawaii Kaneohe Bay, MCTAB, and Pu'uloa RTF. Sections 3.5.1.4 and 3.5.1.5 present an overview of federal and state special-status species for all three locations.

3.5.1.1 MCB Hawaii Kaneohe Bay

Vegetation

The affected area consists mostly of built or modified landscape with no notable ecological communities on or adjacent to the construction sites. Historically, the affected area was cleared with heavy equipment and lacks native vegetation cover. Most of the shoreline at Pyramid Rock and Fort Hase Beach are native coastal strand vegetation such as naupaka (*Scaevola taccada*). The existing non-native vegetation consists of planted landscape material (typically turf grasses such as Bermuda grass [*Cynodon dactylon*], as well as a variety of native and non-native planted trees and shrubs) and non-native plants

such as koa haole (*Leucaena leucocephala*), kiawe (*Prosopis pallida*), and Guinea grass (*Megathyrsus maximus*) shrubland. There are no known occurrences of plants proposed or listed as threatened or endangered under the ESA within the affected area.

Hinahina kahakai (*Nama sandwicensis*), which is found on the sand dunes overlooking Pyramid Rock Beach, and maiapilo (*Capparis sandwichiana*), which grows on the 'a'ā lava flows near the Pali Kilo beach cottages (west of the proposed G/ATOR Pad), are State Species of Conservation Concern.

Wildlife

Wildlife, including birds (i.e., seabirds, shorebirds, waterbirds, and passerines), reptiles, non-native mammals, and invertebrates found in the affected area are consistent with those found in a developed and urbanized coastal environment on O'ahu. Invasive species at MCB Hawaii Kaneohe Bay include Cattle Egret (*Bubulcus ibis*), domestic/feral cats (*Felis catus*), rats (*Rattus* spp.), mongoose (*Herpestes javanicus*), and yellow crazy ant (*Anoplolepis gracilipes*). Many non-MBTA and non-ESA listed birds are present within the affected area such as the Common Myna (*Acridotheres tristis*), Zebra Dove (*Geopelia striata*), and Rock Pigeon (*Columba livia*). Many birds present in the Hawaiian Islands, and all resident seabirds, are protected under the MBTA. Ducks observed at MCB Hawaii Kaneohe Bay are the MBTA-listed Mallard (*Anas platyrhynchos*) and Hawaiian Duck-Mallard hybrid (koloa moali, *Anas wyvilliana*) and are not protected under ESA (the ESA-listed Hawaiian Duck is rare due to hybridization) (see Table 3.5-1) (L. Bookless, personal communication, August 24, 2023). MBTA-listed birds with the potential to occur in the area are listed in Table 3.5-1 and are identified by their common name, Hawaiian name, and status of presence within proposed action locations.

3.5.1.2 MCTAB

Vegetation

MCTAB is located within a highly maintained land management unit consisting of an inactive runway and maintained turf. Much of the vegetation is non-native terrestrial landscaping; however, native coastal and beach strand vegetation occurs along the shorelines. There are few naturally occurring native plant species on MCTAB, although some native species have been planted for landscaping. Existing non-native vegetation communities include ironwood (*Casuarina equisetifolia*) forests, koa-haole/Christmas berry shrublands, koa-haole shrublands, mangroves, and pickleweed (*Batis maritima*) flats. There are no known occurrences of plants proposed or listed as threatened or endangered under the ESA within the training area.

Wildlife

The area consists of four terrestrial habitat types that attract wildlife: wetlands, second-growth forests, shrubland, and turf areas. Invasive and feral wildlife such as mongoose, cats, rodents, and pigs have been sighted on MCTAB. Twenty-one species of birds have been observed near MCTAB at Bellows Air Force Station, including three migratory shorebirds, one native waterbird, and 17 introduced land birds (Air Force Civil Engineer Center [AFCEC], 2010) (see Table 3-5.1). Waimānalo Stream runs through the training areas and is a designated Fish and Wildlife Conservation Area and an established wildlife sanctuary.

3.5.1.3 Pu'uloa RTF

Vegetation

Pu'uloa RTF is an entirely built up and modified landscape with no notable ecological communities on or adjacent to the property. The area was cleared with heavy equipment and lacks native vegetation cover. There are a few scattered native species on the beach, and landscaping consists of non-native trees, shrubs, and grasses that are irrigated and maintained in developed areas. Vegetation characteristic of this general area is open tropical dry forest. Observed native shoreline vegetation includes naupaka, pōhuehue (*Ipomea pres-caprae*), 'aki'aki grass (*Sporobolus virginicus*), and milo (*Thespesia populnea*). Non-native vegetation generally consists of scattered kiawe, opiuma (*Pithecellobium dulce*), ironwood, koa haole, pickleweed, buffel grass (*Cenchrus ciliaris*), and fingergrass (*Chloris* spp.). There are no known occurrences of plants proposed or listed as threatened or endangered under the ESA within the Pu'uloa RTF.

Wildlife

A variety of non-native mammals, reptiles, and birds occur at Pu'uloa RTF including feral cats, rats, cane toad (*Bufo marinus*), and Cattle Egret. Efforts to eradicate the invasive coconut rhinoceros beetle (*Oryctes rhinoceros*) are implemented on-site (removal of trees attacked by the beetle). The Pacific Golden Plover (*Pluvialis fulva*) is a commonly observed resident within the open grass areas, while several other indigenous migratory shorebirds can infrequently be seen on the grass and the shoreline, including Wandering Tattler ('ulili, *Tringa incana*), Ruddy Turnstone (*Arenaria interpres*), and Sanderling (hunakai, *Calidris alba*) (Table 3.5-1) (MCB Hawaii, 2019). All of these birds are protected by the MBTA. Table 3-5.1 lists the MBTA species observed at Pu'uloa RTF.

3.5.1.4 Special-status Species – Federal

ESA-listed species with the potential to occur in the affected area at MCB Hawaii Kaneohe Bay, MCTAB, and Pu'uloa RTF are listed in Table 3.5-2 and are identified by their common name, Hawaiian name, regulatory status, and status of presence within the affected area. The text below provides additional context for the species listed in Table 3.5-2. Programs implemented under the INRMP and the Bird/Wildlife Aircraft Strike Hazard (BASH) Plan are currently in place to protect and monitor protected species (MCB Hawaii, 2023a). MCB Hawaii Order 1500.9C has specific guidance for avoidance of species at all three training areas during training activities. There is no federally designated critical habitat for any ESA-listed species on, or close to, the affected areas.

Waterbirds. The Hawaiian Duck is not likely to occur at MCB Hawaii Kaneohe Bay, MCTAB, or Pu'uloa RTF. At MCB Hawaii Kaneohe Bay, the Percolation Ditch Wetland (northern region of Nu'upia Ponds) provides habitat for ESA-listed waterbirds. The Percolation Ditch Wetland is utilized by both the Hawaiian Coot and Hawaiian Gallinule, and both are known to nest along the northern border adjacent to the affected area (L. Bookless, personal communication, August 24, 2023). The Hawaiian Coot populations at MCB Hawaii Kaneohe Bay have increased in recent decades and have returned to historic levels, with activity observed primarily at the Nu'upia Ponds. An average of 20 Hawaiian Gallinules have been documented annually at the Nu'upia Ponds. Hawaiian Coots nest primarily in fresh or slightly brackish shallow water with robust wetland plants, while Hawaiian Gallinules construct floating nests in freshwater with dense vegetation. The Hawaiian Coot and Hawaiian Gallinule are rarely observed within developed regions of the base (MCB Hawaii, 2023a).

Table 3.5-1 MBTA-Listed Species Known to Occur or with Potential to Occur in the Affected Area

Scientific Name	Common Name	Hawaiian Name	Status of Species Presence		
			MCB Hawaii Kaneohe Bay	MCTAB*	Pu'uloa RTF*
<i>Anas platyrhynchos</i>	Mallard	-	Present	Present	Not Present
<i>Anas wyvilliana</i>	Hawaiian Duck-Mallard hybrid	Koloa moali	Present	Present	Not Present
<i>Nycticorax nycticorax</i>	Black-Crowned Night Heron	'Auku'u	Present	Potential	Not Present
<i>Bubulcus ibis</i>	Cattle Egret	-	Present	Potential	Potential
<i>Fregata minor palmerstoni</i>	Great Frigatebird	'Iwa	Present	Potential	N/A
<i>Puffinus pacificus</i>	Wedge-Tailed Shearwater	'Ua'u kani	Present	Potential	N/A
<i>Phoebastria immutabilis</i>	Laysan Albatross	Mōlī	Present	Potential	N/A
<i>Bulweria bulwerii</i>	Bulwer's Petrel	'Ou	Present	Potential	N/A
<i>Arenaria interpres</i>	Ruddy Turnstone	'Akekeke	Present	Potential	Present
<i>Sula sula</i>	Red-Footed Booby	'Ā	Present	Potential	Not Present
<i>Sula leucogaster</i>	Brown Booby	'Ā	Present	Potential	N/A
<i>Anous minutus</i>	Black Noddy	Noio	Present	Potential	N/A
<i>Onychoprion fuscatus</i>	Sooty Tern	'Ewa'ewa	Present	Potential	N/A
<i>Onychoprion lunatus</i>	Grey-Backed Tern	Pakalakala	Present	Potential	N/A
<i>Phaethon lepturus</i>	White-Tailed Tropicbird	Koa'e kea	Present	Potential	N/A
<i>Tyto alba</i>	Common Barn Owl	-	Present	Potential	N/A
<i>Cardinalis cardinalis</i>	Northern Red Cardinal	-	Present	Potential	Potential
<i>Haemorhous mexicanus</i>	House Finch	-	Present	Potential	Potential
<i>Pluvialis fulva</i>	Pacific Golden Plover	Kōlea	Present	Potential	Present
<i>Tringa incana</i>	Wandering Tattler	'Ūlili	N/A	N/A	Present
<i>Calidris alba</i>	Sanderling	Hunakai	N/A	N/A	Present
<i>Numenius tahitiensis</i>	Bristle-Thighed Curlew	Kioea	Present	Potential	N/A

Notes: Potential = bird presence has been observed near to the affected area, no confirmed observation within; Present = confirmed presence within the affected area; Not Present = surveys have not indicated presence, or unsuitable habitat.

*Bird surveys have not been conducted at MCTAB or Pu'uloa RTF locations. Species with N/A have not been observed and their likelihood to occur cannot be determined.

Legend: MCB = Marine Corps Base; MCTAB = Marine Corps Training Area Bellows; N/A = Not Applicable; RTF = Range Training Facility.

Source: MCB Hawaii, 2022b; L. Bookless, personal communication, August 24, 2023.

Table 3.5-2 Special-status Species Known to Occur or with Potential to Occur in the Affected Area

<i>Scientific Name</i>	<i>Common Name</i>	<i>Hawaiian Name</i>	<i>Regulatory Status</i>	<i>MCB Hawaii Kaneohe Bay</i>	<i>MCTAB*</i>	<i>Pu'uloa RTF*</i>
Birds						
<i>Fulica alai</i>	Hawaiian Coot	‘Alae ke’oke’o	FE, SE	Present	Present	Not Present
<i>Gallinula galeata sandvicensis</i>	Hawaiian Gallinule	‘Alae ‘ula	FE, SE	Present	Present	Not Present
<i>Himantopus mexicanus knudseni</i>	Hawaiian Stilt	‘Ae’o	FE, SE	Present	Present	Not Present
<i>Hydrobates castro</i> (<i>Oceanodroma castro</i>)	Band-Rumped Storm Petrel	‘Akē ‘akē	FE, SE	Potential	Potential	Potential
<i>Pterodroma sandwichensis</i>	Hawaiian Petrel	‘Ua’u	FE, SE	Potential	Potential	Potential
<i>Puffinus newelli</i> (<i>Puffinus auricularis newelli</i>)	Newell’s Shearwater	‘A’o	FT, ST	Potential	Potential	Potential
<i>Asio flammeus sandwichensis</i>	Hawaiian Short-Eared Owl	Pueo	SE*	Present	Potential	Potential
<i>Gygis alba</i>	White Tern	Manu o kū	ST	Present	Potential	Present
Terrestrial Mammals						
<i>Aeorestes semotus</i> (<i>Lasiurus cinereus semotus</i>)	Hawaiian hoary bat	‘Ōpe‘ape‘a	FE, SE	Present	Present	Present
Arthropods						
<i>Danaus plexippus</i>	Monarch butterfly	-	C	Present	Potential	Potential
<i>Hylaeus anthracinus</i>	Anthracinan yellow-faced bee, Hawaiian yellow-faced bee	Nalo meli maoli	FE, SE	Present	Not Present	Not Present
Marine Mammals						
<i>Neomonachus schauinslandi</i>	Hawaiian monk seal	‘Ilioholoikauaua	FE, SE	Present	Present	Present

<i>Scientific Name</i>	<i>Common Name</i>	<i>Hawaiian Name</i>	<i>Regulatory Status</i>	<i>MCB Hawaii Kaneohe Bay</i>	<i>MCTAB*</i>	<i>Pu'uloa RTF*</i>
Marine Reptiles						
<i>Chelonia mydas</i>	Green sea turtle	Honu	FT, ST	Present	Present	Present

Notes: Selections for Listing Status Column include: C = candidate species for ESA listing; FE = federal endangered; SE = state endangered; FT = federally threatened; ST = state threatened. Potential = bird presence has been observed near the affected area or is reasonable to assume utilization, no confirmed observation within; Present = confirmed presence within the affected area; Not Present = surveys have not indicated presence, or unsuitable habitat.

*Bird surveys have not been conducted at MCTAB or Pu'uloa RTF locations.

*The pueo is state listed as endangered only on the island of O'ahu.

Legend: MCB = Marine Corps Base; MCTAB = Marine Corps Training Area Bellows; RTF = Range Training Facility.

Source: MCB Hawaii, 2022b; L. Bookless, personal communication, August 24, 2023.

Hawaiian Stilts can be found along shoreline, estuarine, and freshwater habitats, as well as in grassy areas of developed regions on MCB Hawaii Kaneohe Bay, and have been observed in the affected areas, particularly when ponding occurs on grassy or developed surfaces. At Pollock Field, where Project #2 would be constructed, the Hawaiian Stilt has been observed foraging and loafing. The Hawaiian Stilt has been observed at the Percolation Ditch Wetland adjacent to the affected area but is a rare visitor at this location (L. Bookless, personal communication, August 24, 2023). Due to the proximity of wetlands where waterbird nesting occurs, ESA-listed waterbird presence within the affected areas is likely. At MCTAB, the listed waterbird species have primarily been observed along Waimānalo Stream and wetland areas within the training area. Hawaiian waterbirds have not been documented at Pu'uloa RTF, and suitable habitat does not exist.

Seabirds. The endangered Hawaiian Petrel ('ua'u, *Pterodroma sandwichensis*), threatened Newell's shearwater ('a'o, *Puffinus newelli*), and band-rumped storm petrel ('akē 'akē, *Hydrobates castro*) have the potential to transit over MCB Hawaii Kaneohe Bay, MCTAB, and Pu'uloa RTF (MCB Hawaii, 2023a). However, none of these seabird species have been detected or observed in the affected area. Sound meter surveys conducted in 2016 and 2017 detected Newell's shearwater in both the Wai'anae and Ko'olau Mountains, and the Hawaiian Petrel in the Wai'anae Mountains (MCB Hawaii, 2023a). Because of the proximity of these areas to MCB Hawaii Kaneohe Bay, these seabird species may fly within the affected area as they move from the mountains to the ocean to forage for food. The Newell's shearwater is known to utilize waters offshore of MCTAB, but is not common (AFCEC, 2010).

Hawaiian Hoary Bat. On MCB Hawaii Kaneohe Bay, MCTAB, and Pu'uloa RTF, the endangered Hawaiian hoary bat ('ōpe'ape'a, *Aeorestes semotus*) has been detected on a transitory basis, but no roosting sites have been identified. They are a nocturnal species that roosts solitarily during the day (except mothers and pups) in native and non-native trees and forage along the edges of forest and within shrublands and open spaces, including pastures, roadways, forest gaps, and over areas of fresh/brackish water as well as open saltwater (MCB Hawaii, 2023a). Surveys completed in 2021 at all three training areas detected bats during August through December, which overlaps with the reproductive season, but foraging activity was rarely observed (Pinzari et al., 2021). While the Hawaiian hoary bat does transit and forage at all three training areas, overall presence was low (Pinzari et al., 2021). Despite low detection rates, the proposed facilities construction project locations at MCB Hawaii Kaneohe Bay may be used by foraging bats and some locations may harbor suitable roost habitat (Pinzari et al., 2021).

Monarch Butterfly. The monarch butterfly (*Danaus plexippus*) is currently a candidate for federal listing and is seen in the affected area in search of desired vegetation such as crown flower (*Calotropis gigantea*). On MCB Hawaii Kaneohe Bay, eight crown flower plants occur near affected areas proposed

for the G/ATOR Pad and Warehouse, as well as at the Klipper Golf Course (outside of the affected area). There are butterflies near the entry kiosk of MCTAB and crown flower near Waimānalo Stream. There have been no observations of the monarch butterfly at Pu'uloa RTF.

Hawaiian Yellow-faced Bee. The Hawaiian yellow-faced bee (*nalo meli maoli*, *Hylaeus anthracinus*) is known to occur in coastal regions of O'ahu in narrow rocky corridors along the shoreline (Magnacca and King, 2013). On MCB Hawaii Kaneohe Bay, populations have been documented along Pyramid Rock and North Beach shorelines, north of the proposed G/ATOR Pad component, approximately 400 feet from the affected area (Magnacca, 2017). Recently, much of the bee habitat in that area has been marked and fenced off to prevent disturbance to the bee habitat. Additionally, assault lanes have been established with posts and chains to prevent inadvertent use of bee habitat areas for training activity (L. Bookless, personal communication, August 24, 2023). There have been no observations of the Hawaiian yellow-faced bee at MCTAB or Pu'uloa RTF.

Green Sea Turtle and Hawaiian Monk Seal. On MCB Hawaii Kaneohe Bay, Hawaiian monk seals and green sea turtles haul-out on beach areas, including Pyramid Rock, North Beach, and Fort Hase Beach. Green sea turtle nesting occurs at North Beach. On rare occasions, olive ridley turtle nesting has occurred at Pyramid Rock Beach (MCB Hawaii) but is unlikely to occur; neither hawksbill turtle nor olive ridley turtle species have been observed nesting at MCTAB. Green sea turtles have been confirmed to haul-out at MCTAB, and both green sea turtles and monk seals have been confirmed to haul-out on the Pu'uloa RTF shoreline.

3.5.1.5 Special-status Species – State

Hawaiian Short-Eared Owl. The endemic land-dwelling Hawaiian Short-Eared Owl or pueo (*Asio flammeus sandwichensis*) is state-listed as endangered on O'ahu and has been documented throughout the Mōkapu Peninsula, as well as near affected areas at MCB Hawaii Kaneohe Bay. The vegetation around Nu'upia Ponds provides suitable nesting habitat for this ground-nesting raptor, and it has been observed traversing, nesting, and foraging there (MCB Hawaii, 2023a; Price Lab, 2022). At least seven pueos were estimated to utilize the base during the 2020–2021 breeding season, and it is likely the number of birds utilizing the area varies between seasons and from year to year (Price Lab, 2022). Based on observations during the same study, the resident population of pueo at MCB Hawaii Kaneohe Bay is likely to be three to four individuals (Price Lab, 2022). Nests are documented adjacent to the Project #3 affected area (L. Bookless, personal communication, July 13, 2022). Occasionally, juvenile pueo have been observed loafing around the northern perimeter of Nu'upia Ponds (L. Bookless, personal communication, August 24, 2023). The pueo may traverse MCTAB and Pu'uloa RTF, but no observations have been recorded during surveys (Price Lab, 2022; MCB Hawaii, 2019).

White Tern. Suitable habitat for the state-listed threatened White Tern (*Gygis alba*) exists outside the project footprints within the affected area at MCB Hawaii Kaneohe Bay and the species has been observed in flight, but no nesting sites have been found (L. Bookless, personal communication, August 24, 2023). White Terns may also occur at the MCTAB training site. White Terns have recently been documented nesting at Pu'uloa RTF, as suitable trees exist on site for the species to nest (L. Bookless, personal communication, August 24, 2023). White terns nest year-round in mature, open-canopy trees; with two peaks in egg-laying occurring in March and October (VanderWerf and Downs, 2018).

3.5.2 Environmental Consequences

The environmental consequences section below describes the impacts of the No-Action Alternative, facilities alternatives, and operational alternatives to vegetation and wildlife at MCB Hawaii Kaneohe Bay, MCTAB, and Pu'uloa RTF. Sections 3.5.2.4 and 3.5.2.5 present an overview of impacts to federal and state special-status species for all three locations. A detailed analysis of ESA-listed species is in the Final Biological Assessment (Appendix D).

3.5.2.1 No-Action Alternative

Under the No-Action Alternative, the proposed action would not occur and there would be no change to biological resources.

3.5.2.2 Facilities Alternatives

Preferred Facilities Locations

Vegetation

The preferred facilities construction components identified in Section 2.2.2.1 would collectively result in the conversion of approximately 3 acres of existing landscaped vegetation to impervious surfaces. Vegetated portions of the affected area consist of mostly planted landscape material; no notable ecological communities occur on or adjacent to the construction sites. Site preparation and construction activities would involve the clearing of non-native shrubs and grasses. Vegetation restoration would include ground preparation, planting, temporary irrigation, and maintenance. Restored turf grass vegetation would be installed over a bio-degradable erosion-control fabric and would incorporate at least 50% native plant species. To prevent human-made erosion over time, landscape treatment would consist of planting, protective fencing, and walkways. The BMPs in Table 2-4, such as bioretention, vegetated swales, and pervious pavement, would manage stormwater volumes and avoid any potential flooding or ponding at and near the affected area. Therefore, there would be minimal change to the type and volume of water affecting vegetation in the affected area. Proposed native plant vegetation restoration and landscape repair and potential diversion features incorporated to the extent possible to increase flow of stormwater to nearby wetlands would result in minor beneficial impacts to vegetation in the affected area. For these reasons, the preferred facilities construction component would have less than significant impacts to vegetation.

Wildlife

Impacts identified for birds generally apply to all species present. Unique impacts specific to individual species or groups of birds are further detailed where applicable. The impact analysis below details the following “stressors” that can affect wildlife: habitat, water quality, fallout/disorientation, strike, and noise disturbance. A collective impact conclusion is presented at the end of this subsection.

Habitat. Approximately 3 acres of disturbed, manicured/landscaped vegetation would be cleared and developed into impervious ground cover or facilities. The proposed new impervious surfaces impact only landscaped areas that currently provide minimal habitat for ground-nesting and foraging bird species. There are few shrubs or trees in the affected area that provide suitable habitat for wildlife. Impacts to wildlife species (primarily birds and lizards) would be minimal as existing species are mobile, and similar low-quality habitat is plentiful and easy to access. If disturbed by construction, wildlife would be able to temporarily leave the immediate area of construction and find similar habitat nearby on the installation.

Water Quality. Standing water attracts birds such as waterbirds and Cattle Egrets. To minimize this attraction, construction activities would be managed to avoid creating temporary ponding in the affected area, including covering stormwater detention basins. Construction activities would comply with NPDES permit requirements and the existing Storm Water Management Plan (MCB Hawaii, 2023b), thereby minimizing impacts to water quality. In addition, BMPs such as the use of bioretention techniques, vegetated swales and filter strips, and retention basins would further minimize impacts.

Fallout/Disorientation. Seabird fallout can occur when unnatural lighting at night attracts and disorients birds to areas that may place them in dangerous conditions leading to their injury or death, as well as increased risk for potential bird aircraft strikes. Many bird species are attracted to facilities with lights, so lighting use during nighttime construction is a potential stressor to nocturnal or light-sensitive seabird species. To minimize this potential impact, night work would be minimized during proposed construction (see Table 2-4). If lighting is required during construction, all exterior lights would meet or exceed MCB Hawaii, USFWS, National Oceanic and Atmospheric Administration (NOAA), and/or International Dark-Sky Association standards for exterior lighting and the type of work to be undertaken. Additional BMPs to further reduce risk of fallout (see Table 2-4) include use of tinted windows, elimination of lighting on the top of buildings, and relocating lights as close to the ground as possible. In addition, all on-site contractors would be briefed on how to conduct construction in the presence of light-attracted bird species (L. Bookless, personal communication, March 6, 2022).

Strike. There is a very slight risk of injury or death to birds due to vehicle or equipment collisions during construction. BMPs described above to prevent temporary ponding and excess lighting would minimize attraction of birds to the construction area thereby minimizing risk of strike.

Noise Disturbance. Construction-related noise may temporarily displace wildlife from habitat in the immediate vicinity of the affected area; however, the habitat in the affected area consists of mostly developed and landscaped area. In addition, construction would be temporary and would occur in previously developed and actively used areas where machinery is in regular use. In these construction areas, birds have either adapted to the general noise of the construction areas or would temporarily relocate from the construction areas to adjacent habitats.

For the reasons described above, the preferred facilities construction component would have less than significant impacts to wildlife.

Alternate Facilities Locations

Vegetation

Under this alternative, alternate facilities locations would primarily involve reuse and renovation of existing facilities, and there would be minimal construction. Only Projects 2 and 3 would involve ground disturbance and construction. Project 2 construction would occur in a developed area and would only alter existing landscaped vegetation occurring in that area. The Motor Pool Wetland is west of the 1/12 Gun Park, and a Wildlife Management Area is across Mōkapu Road; however, construction would only occur within the 1/12 Gun Park area and would not affect the wetland or Wildlife Management Area. In addition, site preparation, landscaping, and design features described above and shown in Table 2-4 would also be implemented for the alternate facilities locations. For these reasons, the alternate facilities construction component would have less than significant impacts to vegetation.

Wildlife

Project 2 construction would occur in a developed area and would only alter existing landscaped vegetation occurring in that area. As described above, Project 3 construction would not affect the wetland or Wildlife Management Area. These projects are in locations similar to the preferred facilities locations, so the analysis of stressors above would apply to the alternate facilities locations. For these reasons, the alternate facilities construction component would have less than significant impacts to wildlife.

3.5.2.3 Operational Alternatives**Alternative 1***Vegetation*

Training with the modernized equipment would occur in the same locations and be the same type and have the same tempo as current ground-based training with legacy equipment. Proposed training activities would not expand the available training areas at MCB Hawaii Kaneohe Bay, MCTAB, and Pu'uloa RTF or involve impacts to new areas. Training with modernized equipment would occur at the same locations within the three training areas where ground-based training and other activities currently occur, and the proposed training activities are similar to existing activities with legacy equipment. This includes routine vegetation maintenance and ground training in established training locations. All training activities occurring on vegetated areas would adhere to procedures established in MCB Hawaii Order 1500.9C to reduce potential impacts to terrestrial biological resources. Therefore, Alternative 1 training would have less than significant impacts to vegetation at MCB Hawaii Kaneohe Bay, MCTAB, and Pu'uloa RTF.

Wildlife

As noted previously, Alternative 1 training would be similar to existing training at MCB Hawaii Kaneohe Bay, MCTAB, and Pu'uloa RTF for type, tempo, and areas of training. As such, it would be conducted pursuant to the same procedures including the INRMP program and MCB Hawaii Order 1500.9C designed to minimize any impacts to wildlife. More specifically, Chapter 2 of this order includes specifications for environmental coordination, identification of environmental constraints, and identification of off-limits areas and prohibited activities, including:

- How to manage and report fuel spills or hazardous materials incidents.
- Coordinating with ECPD.
- Avoiding damage to beach foliage, sand dunes, vegetated cover along shorelines, trees, and shrubbery by transiting on existing roadways and trails.
- Parking only in authorized areas.
- Avoiding the following activities except where previously approved:
 - Disposing of trash, explosive material, or hazardous materials/waste;
 - Draining of oil, fuel, or hazardous materials onto the ground or into the water;
 - Removal or intentional destruction of plants, trees, brush, or other vegetation;
 - Killing, injuring, or harassing wildlife;
 - Use of detergents or chemicals for cleaning/maintain vehicles and equipment; and
 - Use of live ordnance without MCB Hawaii approval.

- Avoiding off-limit areas:
 - Wetlands at MCB Hawaii Kaneohe Bay and MCTAB;
 - Waimānalo Stream; and
 - State of Hawaiʻi or private property.

Training would involve vehicles accessing a location within one of the three training areas, using established vehicle paths and/or approved areas to move from one location to another, setting up the equipment in a particular location, operating the equipment in that area, and then demobilizing and moving either to another location within the training area or back to MCB Hawaii Kaneohe Bay. In some cases, the personnel would bivouac (stay overnight) at the location as part of the training.

Habitat. Many non-listed and MBTA-listed birds occur in the affected area. As noted above, Marine Corps ground-based forces would train in a similar manner to how they currently train at MCB Hawaii Kaneohe Bay, MCTAB, and Puʻuloa RTF and would continue to follow procedures identified in Chapter 2 of the MCB Hawaii Order 1500.9C, including requiring no training within or adjacent to Waimānalo Stream and a 100-yard buffer zone around the mouth of the stream. Proposed training with modernized equipment would occur on existing trails and areas currently used for ground-based training at these locations, with no additional habitat disturbance at any of the three training areas. As such, proposed training with modernized equipment would not alter, degrade, or reduce the amount of habitat at any of the three training areas.

Water Quality. Possible operational impacts to water are increased ponding on developed surfaces and contamination of water sources frequented by birds or mammalian species. With regard to ponding, applicable LID techniques such as vegetated swales established during construction at MCB Hawaii Kaneohe Bay would remain beyond the construction period (see Table 2-4 for a complete list of water-related BMPs). Regarding possible contamination of water resources, design features would capture and contain any potential spills from facilities operations to prevent water contamination. Additional LID features for water management beyond the construction period (see Table 2-4) would be implemented to further minimize potential pollutants entering stormwater flows. In addition, training with modernized equipment at MCB Hawaii Kaneohe Bay, MCTAB, and Puʻuloa RTF would be similar to current ground-based training and would continue to adhere to procedures in MCB Hawaii Order 1500.9C. This includes no training occurring within or adjacent to Waimānalo Stream or in a 100-yard buffer zone around the mouth of the stream.

Fallout/Disorientation. Fallout could occur from operational lighting in the affected area of MCB Hawaii Kaneohe Bay (no operational lighting would occur at MCTAB or Puʻuloa RTF). Equipment to reduce fallout includes installation of down-shielded lights, tinted windows, and a full cutoff feature that minimizes backlight, uplight, and glare. Exterior lighting would follow MCB Hawaii “WILDLIFE FRIENDLY LIGHTING” standards (MCB Hawaii, 2022a) (see Table 2-4 for a complete list of lighting BMPs). Training would avoid operations requiring artificial nighttime lighting.

Strike. There is little to no risk of strike to wildlife (such as birds in flight) associated with training at MCB Hawaii Kaneohe Bay, MCTAB, and Puʻuloa RTF. The training would be virtually identical to training conducted with existing equipment, with, among the other requirements in 1500.9C, limiting vehicles operating speeds to no greater than 15 miles per hour.

Noise Disturbance. Training with modernized equipment at MCB Hawaii Kaneohe Bay, MCTAB, and Puʻuloa RTF is not likely to cause behavioral disturbance to wildlife due to noise. Studies have shown

that birds can habituate to noise following frequent exposure and cease to respond behaviorally to the noise (Larkin et al., 1996; National Park Service, 1994; Plumpton, 2006). Individuals exposed to noise would return to normal behaviors almost immediately after exposure (Navy, 2018). Natural resources staff conduct bird counts three times annually, and numbers are consistent from year to year. These data support the conclusion that noise from training does not currently result in population decline nor impact breeding or nesting success of resident bird species (L. Bookless, personal communication, June 21, 2022). Because wildlife species would be exposed to the same type of noise, at the same tempo, and in the same areas as existing training with legacy equipment at MCB Hawaii Kaneohe Bay, MCTAB, and Pu'uloa RTF, there would be no change to noise exposure to wildlife resulting from Alternative 1.

For the reasons described above, Alternative 1 training would have less than significant impacts to wildlife at MCB Hawaii Kaneohe Bay, MCTAB, and Pu'uloa RTF.

Alternative 2

The analysis presented above for Alternative 1 training is applicable to Alternative 2 training, except that ground equipment training tempo would increase. Under Alternative 2, there would be an increase of approximately 130 ground equipment training events per year for MCB Hawaii Kaneohe Bay, 125 per year for MCTAB, and 35 per year for Pu'uloa RTF. This would be an average of 2.5 additional ground equipment training events per week for MCB Hawaii Kaneohe Bay and MCTAB and an average of 0.7 additional ground equipment training events per week for Pu'uloa RTF. All other training (e.g., small arms fire) at the three Marine Corps training areas would remain unchanged. The increased training would occur in areas that experience multiple types of training on a regular basis throughout the year. This represents a relatively small change when considered on a daily and weekly basis. With increased ground equipment training with modernized equipment, there would be a minor increase in noise duration and risk of strike; however, there would be no increased impacts to habitat, water quality, or nighttime lighting (fallout/disorientation). As with Alternative 1, all training would comply with the INRMP and 1500.9C requirements specifically designed to ensure minimal impacts to vegetation and wildlife. Given the minimal daily and weekly change to the tempo of training, its similarity to existing conditions and Alternative 1 regarding type and location of training activities, and the requirements in the INRMP and 1500.9C to protect biological resources, Alternative 2 training would have less than significant impacts to terrestrial biological resources at MCB Hawaii Kaneohe Bay, MCTAB, and Pu'uloa RTF.

3.5.2.4 Special-status Species – Federal

A summary analysis for each ESA-listed species is presented below for impacts associated with the facilities construction at MCB Hawaii Kaneohe Bay and training at MCB Hawaii Kaneohe Bay, MCTAB, and Pu'uloa RTF. A detailed analysis of ESA-listed species is in the Final Biological Assessment (Appendix D).

ESA-listed birds. ESA-listed birds at MCB Hawaii Kaneohe Bay, MCTAB, and Pu'uloa RTF would be subject to the same potential construction (MCB Hawaii Kaneohe Bay) and operational impacts (MCB Hawaii Kaneohe Bay, MCTAB, and Pu'uloa RTF) listed above for all birds. No unique stressors or risks have been identified for ESA-listed bird species. Therefore, the impact analysis described above is equally applicable to ESA-listed birds listed in Table 3.5-2. Natural resources staff conduct bird counts three times annually for ESA-listed birds and have found the numbers and species of ESA-listed birds are consistent from year to year, showing that existing training with legacy equipment has not resulted in population decline nor impacted breeding or nesting success. In addition, at MCB Hawaii Kaneohe Bay there has been ongoing construction over the last several years with no observable population change (L. Bookless, personal

communication, June 21, 2022). For these reasons, identical to impacts to wildlife discussed in Section 3.5.2.3, proposed action may affect, but is not likely to adversely affect, ESA-listed bird species.

Hawaiian Hoary Bat. As discussed above, the affected area for facilities construction at MCB Hawaii Kaneohe Bay is mostly developed. Few trees are currently located at areas proposed for vegetation removal, and vegetation removal would be minimal. While the Hawaiian hoary bat has been documented on a transitory basis throughout MCB Hawaii Kaneohe Bay, MCTAB, and Pu'uloa RTF, and may forage within the affected area, no nests or roosts have been detected at any of the training areas (Pinzari et al., 2021; L. Bookless, personal communication, August 24, 2023). Sparsely occurring landscape trees are not suitable for Hawaiian hoary bats based on the lack of a closed canopy system, which Hawaiian hoary bats seek for protection from environmental factors (i.e., rain, wind, and sun). If tree trimming/removal is required, it would be done outside of the hoary bat pupping season (June 1–September 15). Hoary bats would be subject to the same potential construction and training impacts as listed above for birds. While bats are sensitive to noise, there would only be a minor increase in construction noise at MCB Hawaii Kaneohe Bay and no increase in training noise at MCB Hawaii Kaneohe Bay, MCTAB, and Pu'uloa RTF for Alternative 1, with only a slight immeasurable increase for Alternative 2. Any increases in noise duration as a result of current or increased training levels would not introduce sounds or volumes differing from existing training that occurs at these locations. Additionally, bats have not been detected roosting near the affected area where any increases in training would occur. Hence, Alternative 2 would not result in a noticeable change to the acoustic environment for any bats that might potentially be impacted by this noise. BMPs detailed above for regulation of artificial lighting, as well as those measures targeting sediment control to reduce negative impacts from airborne particles during construction, would further reduce potential impacts to bats. Per Table 2-4, proposed fencing would minimize use of barbed wire fencing. Approximately 3,500 linear feet of security fencing at Projects 1, 4, and 5 would potentially include 3-strand barbed wire fencing. However, there is currently barbed wire fencing in portions of these locations, and this would not be a substantial increase in total barbed wire fencing. BMPs to avoid adverse impacts during the pupping season are detailed in Table 2-4. For these reasons, facilities construction and training may affect, but are not likely to adversely affect, the Hawaiian hoary bat.

Monarch Butterfly. Known host plants (crown flower bushes) are planted at the MCB Hawaii Kaneohe Bay ECPD building on the north side of the runway near Mōkapu Road, near the proposed G/ATOR Warehouse project component, and within 900 feet of the proposed G/ATOR Pad component. Host plants are not at or near the location of ground disturbance for Project #8 construction, so they would not be affected. Monarch butterflies have been observed traversing the affected area at MCB Hawaii Kaneohe Bay and at the entry to MCTAB to reach desired vegetation outside of the affected area. The risk of monarch butterfly strike would not be increased from current conditions, as training with modernized equipment would be virtually identical to training conducted with existing equipment. No training would occur within or adjacent to Waimānalo Stream at MCTAB where crown flower occurs. There have been no observations of monarch butterfly at Pu'uloa RTF. For these reasons, facilities construction and training would have no effect on the monarch butterfly.

Hawaiian Yellow-faced Bee. A large population of Hawaiian yellow-faced bees is known to exist in the coastal regions north of the affected area at MCB Hawaii Kaneohe Bay. The Hawaiian yellow-faced bee is known to generally occur no further than 100 meters from the shoreline (L. Bookless, personal communication, August 24, 2023). Suitable habitat along vegetated sand dunes is near the proposed G/ATOR Pad; however, no construction or new training is planned along the shoreline that would affect

potential habitat for the Hawaiian yellow-faced bee. Additionally, bee habitat has recently been marked with posts and chains to prevent recreational or training activities from disturbing such areas (L. Bookless, personal communication, August 24, 2023). Further BMPs to minimize disturbance to shoreline habitat are described in Table 2-4. There have been no observations of the Hawaiian yellow-faced bee at MCTAB or Pu'uloa RTF. For these reasons, facilities construction and training would have no effect on the Hawaiian yellow-faced bee.

Hawaiian Monk Seal and Green Sea Turtle. Hawaiian monk seals and green sea turtles occasionally haul-out on the beaches at MCB Hawaii Kaneohe Bay, MCTAB, and Pu'uloa RTF. MCB Hawaii Order 1500.9C has specific guidance for avoiding impacts to these species. Should a monk seal or sea turtle be discovered "beached" within any shoreline training area at MCB Hawaii Kaneohe Bay, MCTAB, or Pu'uloa RTF, all activity within 150 feet must cease and follow the guidance in Table 2-4. The training unit must immediately notify Range Control about the presence of the animal who then notifies MCB Hawaii Natural Resources. Current ground-based training conducted at these locations follows this guidance to avoid potential impacts to those species when present on the beach. Ground-based training with modernized equipment would be virtually identical to ground-based training currently conducted at these locations with legacy equipment. The Marine Corps would continue to follow MCB Hawaii Order 1500.9C guidance to avoid potential impacts to these species when present on the beach. In addition, if training with modernized equipment were to occur during non-daylight hours, the Marine Corps would follow lighting guidance identified in Table 2-4 to avoid the potential for impacts to green sea turtles while hauled out on the beaches or during nesting activities. Additional BMPs for sea turtles are identified in Table 2-4. For these reasons, facilities construction and training would have no effect on the Hawaiian monk seal and green sea turtle.

3.5.2.5 Special-status Species – State

Hawaiian Short-Eared Owl. There is suitable pueo foraging habitat in the affected area. The affected area, particularly the Project 2 and 3 components, are within the outer home range of pueos resident to Nu'upia Ponds (MCB Hawaii, 2023a; Price Lab, 2022). To reduce risk to pueos in tall grasses, project construction and operational maintenance would adopt the BMPs identified in Table 2-4 including halting any potentially harmful activity if nests, eggs, or chicks are observed. If adults, nests, or chicks are found and/or flushed out during construction or training activity, contractors must stop work and inform MCB Hawaii natural resources staff of the species' presence (Price Lab, 2022). Noise effects to pueos would be the same as those described above for birds. There have been no observations of pueo at MCTAB or Pu'uloa RTF. Therefore, facilities construction and training would have less than significant impacts to the pueo.

White Tern. There is suitable habitat within the affected area at MCB Hawaii Kaneohe Bay, MCTAB, and Pu'uloa RTF, and nesting has been documented at Pu'uloa RTF. To the maximum extent practicable, any tree trimming activities would avoid the peak egg-laying/nesting months (March and October) and nest surveys would be conducted prior to tree removal, pruning, or trimming activities. If the tree scheduled for removal, pruning, or trimming is found to contain a nest, the tree would not be disturbed until the chicks have fledged (approximately 48 days). Noise effects to white terns would be the same as those described above for birds. Therefore, facilities construction and training would have less than significant impacts to the white tern.

3.6 Public Health and Safety

Public health and safety evaluates whether the proposed action has the potential to affect the safety, well-being, or health of members of the public. Health and safety issues include impacts from noise (addressed in Section 3.1, *Noise*), potential water resources effects (addressed in Section 3.3, *Water Resources*), vehicle safety from vehicle convoy movements to and from training areas, and training safely with the modernized equipment.

3.6.1 Affected Environment

There are many common safety procedures that occur across the three training areas (MCB Hawaii Kaneohe Bay, MCTAB, and Pu'uloa RTF). The affected environment description below summarizes these key public health and safety elements that are applicable to all three training areas: SOPs, access, and the training activities themselves.

3.6.1.1 Standard Operating Procedures

Existing SOPs to protect public health and safety common to all Marine Corps training areas include:

- MCB Hawaii Order 1500.9C, *Standing Operating Procedures for Marine Corps Base Hawaii Ranges and Training Areas*. This Order consolidates and standardizes the procedures for the effective, efficient, and safe planning, scheduling, and execution of Marine Corps ground, logistics and aviation training on MCB Hawaii ranges. It also establishes the regulations necessary to ensure Marine Corps training is conducted and readiness is maintained while preserving life, equipment, and natural resources. More specifically, the Order requires:
 - A Range Control Officer be assigned for all training events to manage and oversee safety during training.
 - Establishing and implementing all feasible access controls to deter unauthorized access.
 - Conducting range safety training.
 - Publishing public notices in advance of training.
 - Implementing response procedures in the case of a release of hazardous materials during training.
 - Ensuring scheduling and safe operations for aviation training, including:
 - deconfliction of airspace for aviation training; and
 - procedures and flight paths for safe use of helicopter and tilt-rotor aircraft landing zones at MCB Hawaii Kaneohe Bay and MCTAB; identification of areas for aircraft to avoid to minimize BASH potential, in accordance with the BASH Plan (Marine Corps, 2011).
 - Ensuring safe operations for amphibious training, including:
 - submitting a Notice to Mariners to the U.S. Coast Guard in advance of training;
 - ensuring that no vehicles, non-participating watercraft, or unauthorized people are within 100 meters of moving watercraft;
 - training is conducted in accepted weather and surf conditions;
 - amphibious training equipment and personnel remain within designated locations for each event; and
 - restoring the beach sand to its original condition following each event.

- Ensuring adherence to fire protection procedures.
- MCB Hawaii Order 3060.1, *Tactical Driving in Hawaii*, addresses vehicle convoys on O‘ahu and provides procedures and requirements for military vehicle movement to ensure safe convoy movement of military vehicles throughout O‘ahu (MCB Hawaii, 2020). This Order designates specific convoy routes, convoy timing, and techniques and procedures for convoy transportation to deconflict military transport from civilian traffic. Specific elements of the Order are listed in Section 3.7, *Transportation*.
- The MCB Hawaii Kaneohe Bay *Hazardous Waste Management Plan* governs the management of hazardous waste and describes specific responsibilities, requirements, and procedures for the management of all hazardous materials and waste. The plan specifically forbids any training in the vicinity of Installation Restoration Program sites.
- MCB Hawaii Order 3302.1 and the *Marine Corps Base Hawaii Integrated Wildland Fire Management Plan* (MCB Hawaii, 2021b) govern fire management and response protocols for all training activities. The protocols in the Order and Plan are directly incorporated into SOPs for use at Marine Corps training areas, and require the Range Control Officer to incorporate planning and response measures into each training event to prevent wildland fires at all training areas. MCB Hawaii also has a cooperative agreement with the Honolulu Fire Department for response to fires at the installation.
- Dahlgren Division, Naval Surface Warfare Center ltr. 8020 Ser. Q52/2665, controls the use of radar systems and provides hazardous electromagnetic radiation parameters for ordnance and personnel requiring all training to be conducted at minimum prescribed distances from military personnel, ordnance, and fuel to ensure safe operations of radar emitting systems. The existing systems used for ground-based training operate similarly to other navigational aids and radars at civilian airports and television weather stations throughout the U.S., emitting electromagnetic energy similar to that from cell phones, handheld radios, commercial radio stations, and television stations.

3.6.1.2 Access

Location. MCB Hawaii Kaneohe Bay is bounded by Kailua on the south and east and by Kāne‘ohe on the south and west. MCTAB is bound on the south and west by Waimānalo, on the northwest by Kailua, and on the north by Lanikai. Pu‘uloa RTF is bounded on the north by FAA property and undeveloped land; to the east by military privatized housing, an elementary school, and Iroquois Point residential community; to the south by the ocean; and to the west by ‘Ewa Beach Park and the coastal portion of the Eva Beach residential community.

Public Access. The public is not allowed where training occurs at MCB Hawaii Kaneohe Bay and Pu‘uloa RTF. No public access is allowed during training events at MCTAB; however, each weekend Training Area 1 is closed to military activities from noon Friday until 8 a.m. Monday to allow recreational use of the beach. MCB Hawaii notifies the public in advance of training activities at MCTAB and Pu‘uloa RTF; MCB Hawaii Kaneohe Bay is an active military installation and does not engage in routine public notification for training occurring on base.

3.6.1.3 Training Activities

Training at all three training areas follows the procedures described above in Section 3.6.1.1 to ensure a safe training environment for the public. There are no known off-range migration of munitions

constituents that presents a potential unacceptable risk to human health or the environment at any of the three MCB Hawaii training areas on O‘ahu (Marine Corps, 2020). An overview of the types of training that occurs at each training area is summarized below:

- MCB Hawaii Kaneohe Bay. Various types of training occur at multiple areas within MCB Hawaii Kaneohe Bay boundaries (see Figure 1-3). This includes aviation training (at the airfield and at Boondocker Training Area), live-fire and explosives training at designated ranges at Ulupa‘u RTF, amphibious training (at Pyramid Rock, North Beach, and Fort Hase Beach), and ground-based training with legacy equipment (see Sections 2.1.1 and 2.1.3). Locations for ground-based training include Pyramid Rock, Ulupa‘u RTF, Fort Hase Beach, and Boondocker Training Area.
- MCTAB. MCTAB is used by Marines and other military services to conduct amphibious, helicopter, tilt-rotor aircraft, urban training, motorized exercises in conjunction with troop land maneuver training, and ground-based training with legacy equipment (see Sections 2.1.1 and 2.1.3). Landing zones and urban training locations are at and north of the airfield (see Figure 1-4), and amphibious training occurs at the beaches east of the airfield. No live-fire training occurs at MCTAB.
- Pu‘uloa RTF. Pu‘uloa RTF is a live-fire range complex for small arms training, qualification, and requalification for military, state agency, and federal agency training (see Figure 1-4). It is also used for ground-based training with legacy equipment (see Sections 2.1.1 and 2.1.3).

3.6.2 Environmental Consequences

3.6.2.1 No-Action Alternative

Under the No-Action Alternative, the proposed action would not occur and there would be no change to public health and safety.

3.6.2.2 Facilities Alternatives

Preferred Facilities Locations

There would be no public access to the construction areas. Construction would occur in operational areas on the northern, central, and eastern areas of MCB Hawaii Kaneohe Bay during daylight hours. These construction areas are all located on base and at least 0.5 mile from the nearest community (Kailua), so no construction would occur in or near residential housing. All construction zones would be physically secured from and monitored for unauthorized entry, and appropriate measures would be employed to ensure that individuals are not able to gain access to any site during non-work hours. Given the location, limited scope of construction, and access controls, the preferred facilities construction component of Alternative 1 would result in less than significant impacts to public health and safety.

Alternate Facilities Locations

Under this alternative, alternate facilities locations would primarily involve reuse and renovation of existing facilities, and there would be minimal construction. The only construction that would occur would be for Projects 2 and 3, resulting in alternative facility locations having considerably less construction. The safety elements described above for the preferred alternative facilities construction component would be applicable to construction for Projects 2 and 3, resulting in the alternate facilities construction component of alternative facilities locations having less than significant impacts to public health and safety.

3.6.2.3 Operational Alternatives

Alternative 1

Alternative 1 would not increase risks to public health and safety. Training with modernized equipment would occur in the same locations and be at the same type and tempo as current ground-based training with legacy equipment. The Marine Corps would continue to follow existing training protocols identified in Section 3.6.1.1 ensuring emergency preparedness, hazardous waste and regulated non-hazardous waste management, airfield and helipad safety, BASH control, wildland fire prevention, and ordnance safety. The proposed action would not result in any increase of net explosive ordnance stored at MCB Hawaii Kaneohe Bay. Training with modernized equipment would not involve “live fire” activities at any training area. Existing training follows the procedures identified above in Section 3.6.1.3, including procedures for minimizing potential to affect environmental and cultural resources, procedures for vehicle convoys to/from the training areas, and procedures for wildland fire.

Off-base roadways would not be affected for training associated with modernized equipment at MCB Hawaii Kaneohe Bay because personnel and equipment would already be located on base. Roadway safety between MCB Hawaii Kaneohe Bay and the other two training areas (MCTAB and Pu‘uloa RTF) would not change from existing conditions. As described in Section 3.7, *Transportation*, the amount of ground-based training vehicle traffic on roadways annually represents less than 1% of traffic volumes on any of the roadways leading to MCTAB and Pu‘uloa RTF. This small amount does not affect the potential for vehicle mishaps on these roadways. The Marine Corps would continue to adhere to MCB Hawaii Order 3060.1 regarding convoy transportation.

Use of the modernized G/ATOR radar system would occur at MCB Hawaii Kaneohe Bay. Use of G/ATOR system radar and other radar systems would be similar to existing military and civilian radars currently used on O‘ahu. This self-monitoring radar, which operates within FCC limits, automatically turns off if the system exceeds preprogrammed parameters to avoid harming personnel or the environment. Moreover, under no training event would the system be operated in the vicinity of the public. Therefore, operation of the G/ATOR would not create a risk of electromagnetic frequency exposure.

For these reasons, Alternative 1 training would have less than significant impacts to public health and safety.

Alternative 2

Under Alternative 2, there would be an increase of approximately 130 ground equipment training events per year for MCB Hawaii Kaneohe Bay, 125 per year for MCTAB, and 35 per year for Pu‘uloa RTF. This would be an average of 2.5 additional ground equipment training events per week for MCB Hawaii Kaneohe Bay and MCTAB and an average of 0.7 additional ground equipment training events per week for Pu‘uloa RTF. All other training (e.g., small arms fire) at the three Marine Corps training areas would remain unchanged. The increased training would occur in areas that experience multiple types of training on a regular basis throughout the year. This increased training would be conducted in accordance with existing procedures as identified for Alternative 1. This increase in tempo would represent an average of less than one additional vehicle convoy per week on roadways to MCTAB or Pu‘uloa RTF (see Table 2-3). Even with this increase in tempo, military vehicle convoy traffic would still represent less than 1% of all traffic on public roads leading to MCTAB and Pu‘uloa RTF. The absence of any significant change to overall traffic on public roadways – even with an increase in tempo – would not change the potential for vehicle mishaps. For these reasons, Alternative 2 training would have less than significant impacts to public health and safety.

3.7 Transportation

This discussion of transportation involves impacts of the proposed action to off-base roadways, bus routes, bikeways, and access routes into the project locations. The affected environment for transportation consists of the roadways between MCB Hawaii Kaneohe Bay and the two off-base training areas (MCTAB and Pu'uloa RTF).

3.7.1 Affected Environment

The Marine Corps follows MCB Hawaii Order 3060.1, *Tactical Driving in Hawaii*, to ensure the safe movement of military vehicles throughout O'ahu (MCB Hawaii, 2020). MCB Hawaii Order 3060.1 designates specific convoy routes, convoy timing, and techniques and procedures for convoy transportation to deconflict military transport from civilian traffic. Among other requirements, MCB Hawaii Order 3060.1:

- Prohibits the use of off-base public highways by military vehicles between 6 a.m. and 8 a.m. and 4 p.m. and 6 p.m. Monday through Friday.
- Establishes plans and route maps for transportation.
- Requires convoy safety briefs in advance of all training events.

The transportation network between MCB Hawaii Kaneohe Bay, MCTAB, and Pu'uloa RTF consists of interstates, highways, and local roadways. Figure 3.7-1 and Table 3.7-1 show the transportation network on O'ahu between MCB Hawaii Kaneohe Bay, MCTAB, and Pu'uloa RTF. The main roads providing access to MCB Hawaii Kaneohe Bay include H-3 and Mōkapu Road. From MCB Hawaii Kaneohe Bay to MCTAB, the route is H-3 to HI-83 to HI-72. Kalaniana'ole Highway (HI-72) is the main road that provides access to MCTAB, with one turn onto Tinker Road to access the gate at MCTAB. From MCB Hawaii Kaneohe Bay to Pu'uloa, the route involves taking H-3 to H-1 and using Fort Weaver Road (HI-76). The main road that provides access to Pu'uloa RTF is Fort Weaver Road (HI-76) which eventually turns into Cormorant Road near Pu'uloa RTF.

Roadways near the individual training areas are shown in Figures 3.7-2 (MCB Hawaii Kaneohe Bay), 3.7-3 (MCTAB), and 3.7-4 (Pu'uloa RTF).

3.7.1.1 MCB Hawaii Kaneohe Bay

Figure 3.7-2 shows the transportation network immediately outside the installation and the two access gates to the installation.

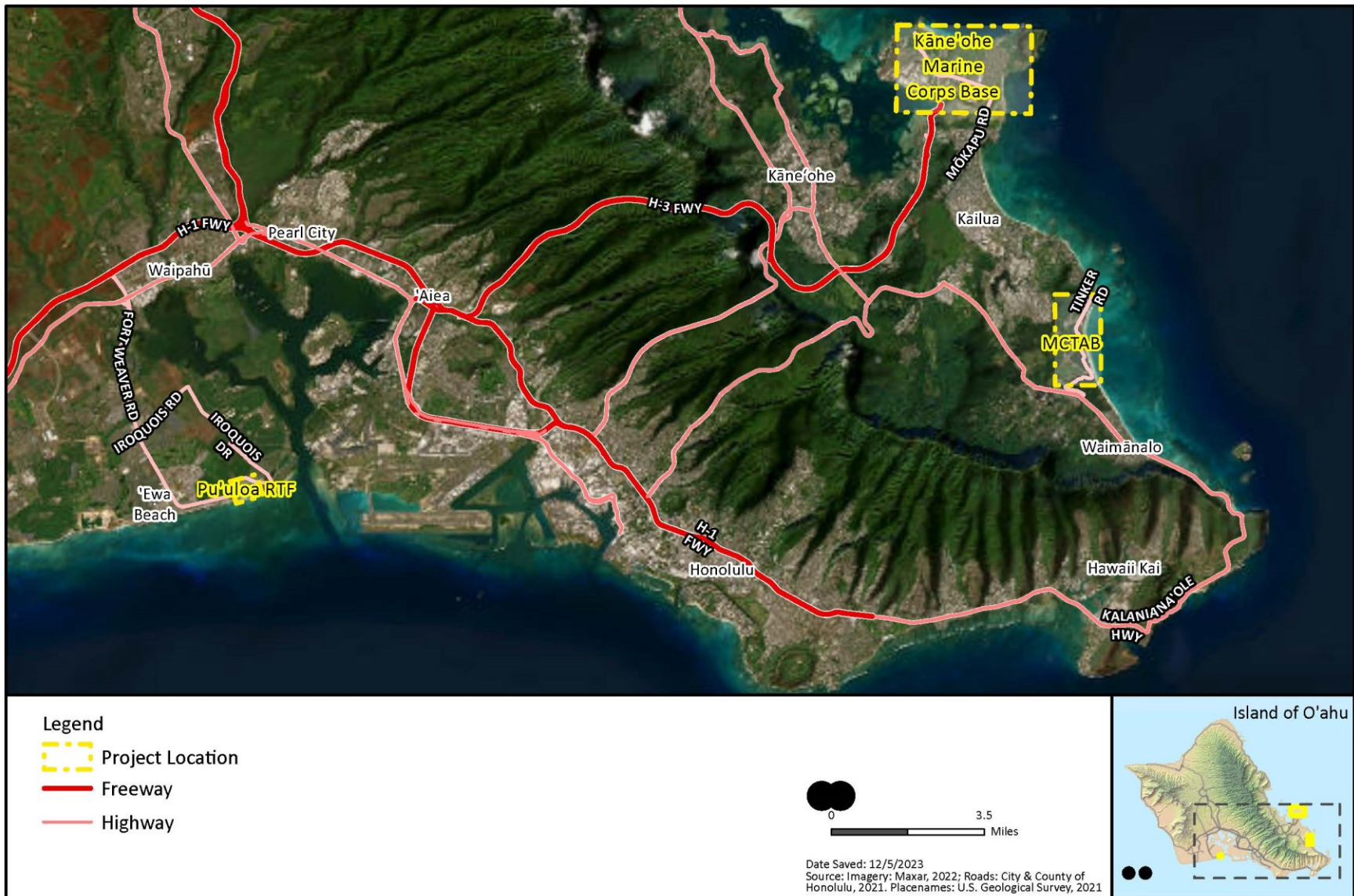


Figure 3.7-1 Roadways Between MCB Hawaii Kaneohe Bay, MCTAB, and Pu'uloa RTF

Table 3.7-1 External Roadway Characteristics

<i>Roadway</i>	<i>Description</i>	<i>Road Type</i>	<i># of Lanes</i>	<i>2020 AADT (HDOT, 2023)¹</i>
MCB Kaneohe Bay				
H-3	From Halawa, around Kāneʻohe, and to MCB Hawaii Kaneohe Bay	Interstate	Four – six (two-three in each direction)	14,800 ²
Mōkapu Road	North Kalaheo Ave to MCB Hawaii Kaneohe Bay	Major Collector	Four (two in each direction)	10,600
Mōkapu Blvd	North Kalaheo Avenue to Kāneʻohe	Principal Arterial	Four (two lanes in each direction)	10,600 ³
Kāneʻohe Bay Drive	North Kalaheo Avenue to Mōkapu Saddle Road	Major Collector	Two (one lane each direction)	9,700 ⁴
North Kalaheo Avenue	Mōkapu Road/Boulevard to Kailua Road	Major Collector	Two (one lane each direction)	13,400
MCTAB				
Kalanianaʻole Highway (72)	Keolu Drive to Inoaole Street	Principal Arterial	Two (one lane each direction)	14,300 ⁵
Tinker Road	Kalanianaʻole Highway (72) to MCTAB Gate	N/A	Two (one lane each direction)	N/A
Puʻuloa RTF				
Fort Weaver Road (76)	From Keoneula Boulevard to North Road	Principal Arterial	Four (two lanes in each direction) with turn pockets	20,600 ⁶
Fort Weaver Road (76)	From North Road to Kilaha Street	Principal Arterial	Four (two lanes in each direction) with turn pockets	6,200 ⁷
Fort Weaver Road (76)	From Kilaha Street to Popoi Place	Principal Arterial	Two (one lane each direction)	2,100 ⁸
North Road	Fort Weaver Road (Route 76)/Hanakahi Street (Route 7144)	Major Collector	Two (one lane each direction)	5,000 ⁹
West Loch Drive	From Iroquois Road to North Road	N/A	Two (one lane each direction)	N/A
Iroquois Road	Fort Weaver Road to West Loch Drive	Major Collector	Two (one lane each direction)	7,400 ¹⁰

Notes: ¹HDOT Federal-Aid Classification Update (HDOT, 2012). No updated guidance provided as this document was based on the 2010 census figures; AADT is a basic measurement that indicates vehicle traffic load on a road segment. AADT estimates the mean traffic volume across all days for a year for a given location along a roadway.

²Route H-3 Between MP 14.86 and 15.316 (HDOT, 2023).

³Route 65 Between MP 3.24 and 4.148 (HDOT, 2023).

⁴Route 6511 between MP 0.00 and 2.58 (HDOT, 2023).

⁵Route 72 Between MP 1.38 and 3.88 (HDOT, 2023).

⁶Route 76 Between MP 1.28 and 2.11 (HDOT, 2023).

⁷Route 76 Between MP 0.92 and 1.28 (HDOT, 2023).

⁸Route 76 Between MP 0 and 0.92 (HDOT, 2023).

⁹Route 7145 Between MP 0 and 0.719 (HDOT, 2023).

¹⁰Route 7141 Between MP 0.28 and 1.49 (HDOT, 2023).

Legend: AADT = Annual Average Daily Traffic; HDOT = Hawaiʻi Department of Transportation; MCB = Marine Corps Base.



Figure 3.7-2 Roadways Near MCB Hawaii Kaneohe Bay

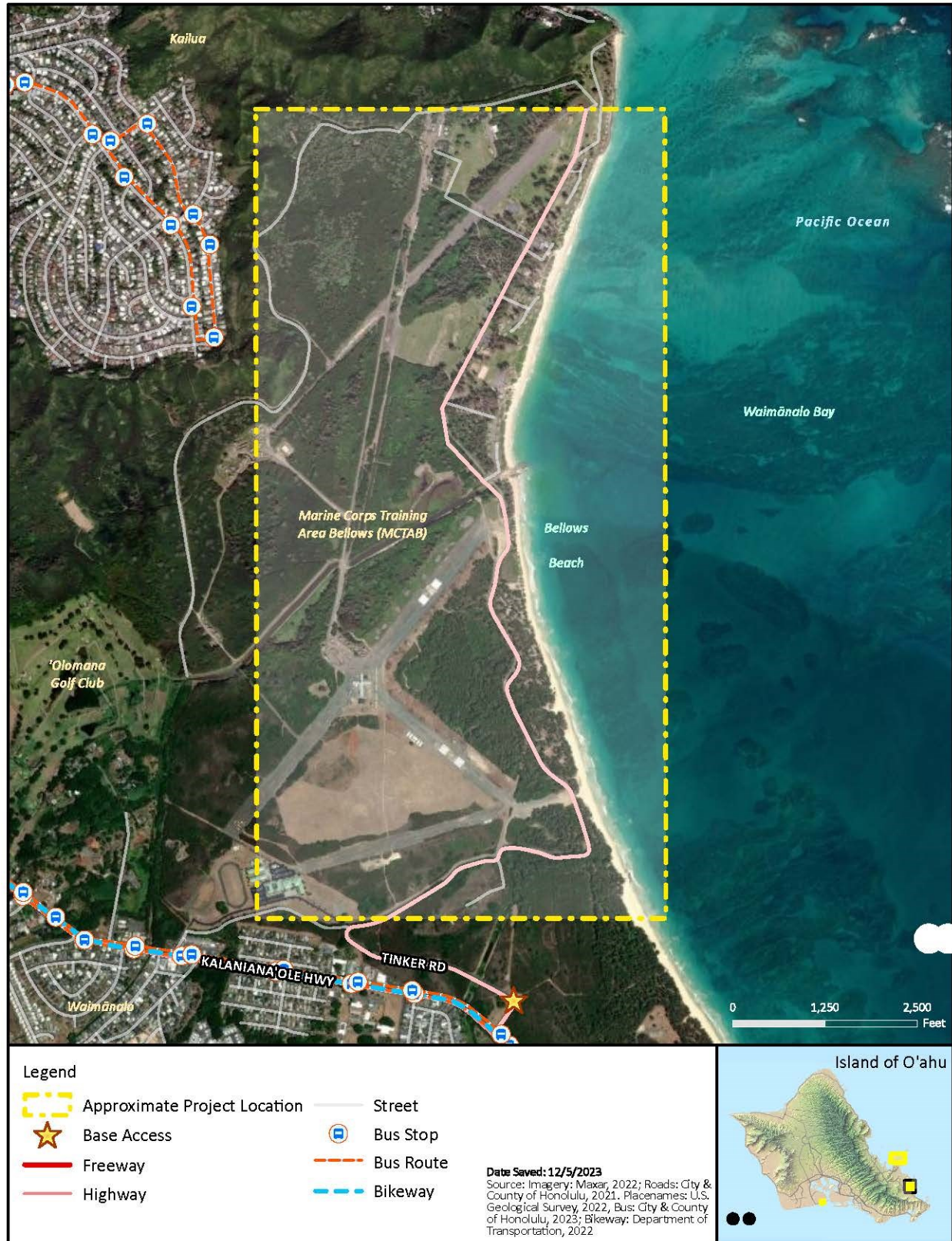


Figure 3.7-3 Roadways Near MCTAB

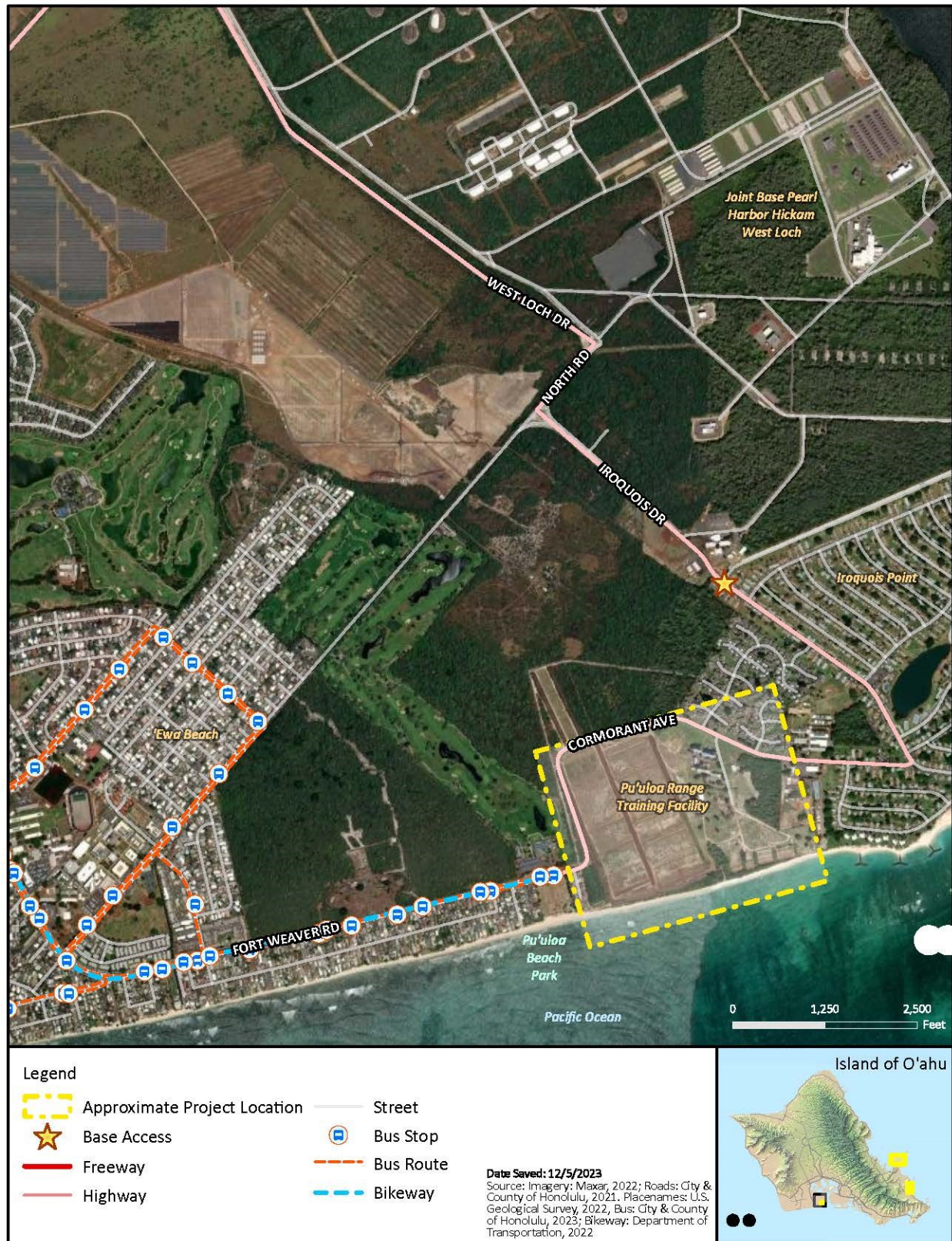


Figure 3.7-4 Roadways Near Pu'uloa RTF

Motor vehicle traffic into MCB Hawaii Kaneohe Bay is controlled by two security gates. The main gate is located at the north end of the H-3 highway (see Figure 3.7-2). It has two inbound and two outbound lanes, and is normally open 24 hours a day, 7 days a week. On a typical weekday, approximately 950 vehicles enter the main gate in the morning peak hour of traffic, and approximately the same number depart via the main gate in the afternoon peak hour of traffic (MCB Hawaii, 2021c). The Mōkapu gate is located on Mōkapu Road, has one inbound and one outbound lane, and is open between 5:00 a.m. and 10:00 p.m. on weekdays and between 8:00 a.m. and 2 p.m. on weekends and holidays. The roadways that provide access to MCB Hawaii Kaneohe Bay are identified in Table 3.7-1 and for those roadways where data is available, annual average daily trips are provided. Current level of service (LOS) data are not available for most roadways outside the base; however, the 2010 LOS data indicated H-3 was LOS A (i.e., free flowing traffic) for most hours of the day, with LOS B (reasonably free flowing traffic) for the peak morning and afternoon traffic hours outside the main entry gate.

There are several bus routes serving the Kailua community in the vicinity of the base; however, there are no bus stops at MCB Hawaii Kaneohe Bay. The nearest bus stop is located at Aikahi Park Shopping Center, which is about 3,000 feet from the Mōkapu gate (see Figure 3.7-2). The distance from the bus stop to the nearest MCB Hawaii Kaneohe Bay residential quarters is about 1.2 miles.

The existing bikeway network near MCB Hawaii Kaneohe Bay consists of shared use paths, bike lanes, and bike routes shared with roadways (City and County of Honolulu, 2019). Bike facilities near MCB Hawaii Kaneohe Bay include a shared use path along the east side of H-3 between Kāneʻohe Bay Drive and MCB Hawaii Kaneohe Bay main gate and a shared roadway along Kāneʻohe Bay Drive between Mōkapu Road and H-3, which connects to other facilities within the Kailua community.

3.7.1.2 MCTAB

Motor vehicle traffic into MCTAB occurs through the entrance on Tinker Road, just off Kalanianaʻole Highway. Beach access to the public is available on weekends and holidays, and the public uses this same route to access the beach. There is currently no LOS data for roads outside the training area. The roadways that provide access to MCTAB are identified in Table 3.7-1 and for those roadways where data is available, annual average daily trips are provided. Route 89 is the one bus route serving the MCTAB community along the Kalanianaʻole Highway. There are two bus stops, one for each direction, on Kalanianaʻole Highway at Tinker Road (see Figure 3.7-3). The existing bikeway network near MCTAB consists of a shoulder bikeway and shared road. Kalanianaʻole Highway is a shared roadway with a shoulder bikeway along both sides of the highway spanning from Kumuhau Street to Oluolo Street (City and County of Honolulu, 2019).

Ground-based training currently occurs approximately 620 times per year at MCTAB. This training involves convoys of vehicles, equipment, and personnel from MCB Hawaii Kaneohe Bay to MCTAB. These convoys are along existing roadways and are consistent with typical roadway traffic. MCB Hawaii Order 3060.1 establishes prescribed convoy routes to designated training areas on Oʻahu. The route to MCTAB uses H-3, Kamehameha Highway, Kalanianaʻole Highway, and Tinker Road entering MCTAB (see Figure 3.7-3). The average number of off-base trips is five per day (see Table 2-3), and MCTAB represents approximately 78% of the off-base training at Marine Corps ranges (see Table 2-1). The largest convoy consists of 10 vehicles. While most convoys are smaller, using 10 vehicles per convoy results in an average of 39 vehicles per day using local roadways to access MCTAB. This represents less than 1% of the Average Annual Daily Traffic (AADT) on Kalanianaʻole Highway (see Table 3.7-1) (AADT is

a basic measurement that indicates vehicle traffic load on a road segment. AADT estimates the mean traffic volume across all days for a year for a given location along a roadway).

3.7.1.3 Pu'uloa RTF

Motor vehicle traffic access to Pu'uloa RTF occurs via Fort Weaver Road to Iroquois Road and then to West Loch Drive and through the Iroquois Point Military Housing community. There is no LOS data for roads outside the training area. The roadways that provide access to Pu'uloa RTF are identified in Table 3.7-1 and for those roadways where data are available, annual average daily trips are provided.

The Route 44 and Route W1 bus routes serve the Pu'uloa RTF community. Route 44 crosses Fort Weaver Road multiple times and ends at the end of Fort Weaver Road where it turns into Cormorant Road (City and County of Honolulu, 2023a). The closest bus stop to Pu'uloa RTF along this bus route is located at Hanakahi Street and North Road (City and County of Honolulu, 2023b). Route W1 follows Fort Weaver Road to North Road and loops back to Fort Weaver Road (shown in Figure 3.7-4) (City and County of Honolulu, 2023a). The closest bus stop on this route to Pu'uloa RTF is at the intersection of Fort Weaver Road and 'Ewa Beach Park (City and County of Honolulu, 2023b).

The existing bikeway network near Pu'uloa RTF consists of shared use paths, bike lanes, and bike routes shared with roadways (City and County of Honolulu, 2019). Bike facilities near Pu'uloa RTF include a shared use path on the west (and north) side of Fort Weaver Road, while there is a bike lane, shoulder bikeway, and portions of a shared roadway along the east (and south) side of Fort Weaver Road. Iroquois Road from Fort Weaver Road to West Loch Road and West Loch Road to North Road is a shared use path. North Road has a dedicated bike lane (City and County of Honolulu, 2019).

Ground-based training currently occurs approximately 180 times per year at Pu'uloa RTF. This training involves convoys of vehicles, equipment, and personnel from MCB Hawaii Kaneohe Bay to Pu'uloa RTF. These convoys are along existing roadways and are consistent with typical roadway traffic. MCB Hawaii Order 3060.1 sets out specific convoy routes to designated training areas on O'ahu that all military must adhere to. The route to Pu'uloa RTF uses H-3, H-1, Fort Weaver Road (Highway 76), Iroquois Road, West Loch Drive, and Cormorant Drive (see Figure 3.7-4). The average number of off-base trips is five per day (see Table 2-3), and Pu'uloa RTF represents approximately 22% of the off-base training at Marine Corps ranges (see Table 2-1). Assuming a maximum of 10 vehicles per convoy, this represents an average of 11 vehicles per day using local roadways to access Pu'uloa RTF. This represents less than 1% of the AADT on the road segment of Fort Weaver Road (see Table 3.7-1).

3.7.2 Environmental Consequences

3.7.2.1 No-Action Alternative

Under the No-Action Alternative, the proposed action would not occur and there would be no change to transportation.

3.7.2.2 Facilities Alternatives

Preferred Facilities Locations

Under Alternative 1, construction traffic would occur on the segment of the H-3 freeway between the Mōkapu Interchange and the MCB Hawaii Kaneohe Bay main gate. Construction traffic would be required to enter and exit the installation through the main gate. The Marine Corps estimated construction traffic using a recent comparable construction project (Mōkapu Elementary School

improvements) would be approximately 68 additional vehicle trips per day entering and exiting the installation at the main gate in the morning and afternoon peak periods, representing a 7% increase over normal conditions if all traffic were to occur in the same hour. While such an increase could cause minor delays in entering the base, it is similar to fluctuations that occur with other construction projects at MCB Hawaii Kaneohe Bay and are accommodated without affecting H-3 traffic (MCB Hawaii, 2021c). The entrance to the main gate is at the end of the H-3 and approximately 0.5 mile from the last H-3 exit. Construction traffic would be considerably less than 1% of average daily traffic volume on H-3 and have no effect on H-3 traffic, which averages 13,400 trips per day. As such, only traffic entering MCB Hawaii Kaneohe Bay would be minimally affected by the proposed action and would not change the LOS of H-3 off base during peak or non-peak hours. Construction vehicles and equipment would be limited to entering the installation through the main gate, so project construction would not impact the off-base neighborhood near Mōkapu gate. An HDOT permit would be required to transport oversized equipment and overweight vehicles on state roadways, such as the H-3.

For these reasons, the preferred facilities construction component of Alternative 1 would have less than significant impacts to transportation outside MCB Hawaii Kaneohe Bay.

Alternate Facilities Locations

Under this alternative, alternate facilities locations would primarily involve reuse and renovation of existing facilities, and there would be minimal construction. As noted in other resources, the only construction that would occur would be for Projects 2 and 3, thus the alternate facility locations would result in significantly less construction activity, a much shorter construction period, and less construction vehicles using the H-3 and local roadways to access MCB Hawaii Kaneohe Bay. The general analysis presented above for construction would apply to the alternative facilities construction components. As such, considering the reduced amount of construction from the preferred construction Alternative 1, the alternative facilities construction component of Alternative 2 would have less than significant impacts to transportation.

3.7.2.3 Operational Alternatives

Alternative 1

Traffic

Training with modernized equipment would occur in the same locations and be at the same type and tempo as current ground-based training with legacy equipment. Training with modernized equipment at MCB Hawaii Kaneohe Bay would involve movement of vehicles from support facilities on the installation to various training locations located on the installation. Under the proposed action there would be no change in the number of Marine Corps Hawaii ground forces personnel, resulting in no additional personnel vehicles added to the road network off the installation.

Training with modernized equipment at MCTAB and Pu'uloa RTF would involve the movement of vehicles from support facilities at MCB Hawaii Kaneohe Bay to MCTAB and Pu'uloa RTF, following the routes identified in Section 3.7.1.2. As explained in Section 2.1.3, the number and types of vehicles and trips for training using the modernized equipment would be similar to the type and tempo of military traffic currently transiting from MCB Hawaii Kaneohe Bay to MCTAB and Pu'uloa RTF (see Table 2-3). Convoys traveling to MCTAB and Pu'uloa RTF would adhere to MCB Hawaii Order 3060.1, which identifies specific routes for transiting and prohibits convoys from using off-base public highways during peak traffic hours. As described for the affected environment, current military traffic represents less

than 1% of the AADT on Kalanianaʻole Highway and less than 1% of the AADT on the most lightly used road segment of Fort Weaver Road (see Table 3.7-1), and this would be the same for Alternative 1.

Bus Routes

Alternative 1 would not impact bus operations on county and state rights-of-way during the construction or training periods, because there are no bus routes to MCB Hawaii Kaneohe Bay, MCTAB, or Puʻuloa RTF. Therefore, Alternative 1 would have no impacts to bus routes.

Bikeways

During the construction and training periods, no changes would occur to bike facilities on county and state rights-of-way. Bikeways and access to bikeways would remain unchanged. Therefore, Alternative 1 would have no impacts to bikeways.

For these reasons, Alternative 1 training would have less than significant impacts to transportation outside MCB Hawaii Kaneohe Bay, MCTAB, and Puʻuloa RTF.

Alternative 2

Traffic

Under Alternative 2, there would be an increase of approximately 130 ground equipment training events per year for MCB Hawaii Kaneohe Bay, 125 per year for MCTAB, and 35 per year for Puʻuloa RTF. This would be an average of 2.5 additional ground equipment training events per week for MCB Hawaii Kaneohe Bay and MCTAB and an average of 0.7 additional ground equipment training events per week for Puʻuloa RTF. All other training (e.g., small arms fire) at the three Marine Corps training areas would remain unchanged. The increased training would occur in areas that experience multiple types of training on a regular basis throughout the year. This would represent an average of less than one additional vehicle convoy per day on roadways to MCTAB or Puʻuloa RTF (see Table 2-3). Modernized equipment training under Alternative 2 would involve movement of vehicles from support facilities at MCB Hawaii Kaneohe Bay to MCTAB and Puʻuloa RTF, following the routes identified in Sections 3.7.1.2 and 3.7.1.3, respectively. With this increase in military traffic, Alternative 2 ground-based training at MCTAB would still represent less than 1% of the AADT on Kalanianaʻole Highway, and anticipated traffic associated with the Alternative 2 level of ground-based training at Puʻuloa RTF would still represent less than 1% of the AADT on Fort Weaver Road. Therefore, the slight increase in training would result in less than significant change to existing roadway traffic volumes.

Bus Routes

Alternative 2 would not impact bus operations on county and state rights-of-way during the construction or training periods, because there are no bus routes to MCB Hawaii Kaneohe Bay, MCTAB, or Puʻuloa RTF. Therefore, Alternative 2 would have no impacts to bus routes.

Bikeways

During the construction and training periods, no changes would occur to bike facilities on county and state rights-of-way. Bikeways and access to bikeways would remain unchanged. Therefore, Alternative 2 would have no impacts to bikeways.

For these reasons, Alternative 2 training would have less than significant impacts to transportation outside MCB Hawaii Kaneohe Bay, MCTAB, and Puʻuloa RTF.

4 Cumulative Impacts

This section (1) defines cumulative impacts; (2) describes past, present, and reasonably foreseeable future actions in the affected area; (3) analyzes the incremental interaction the proposed action may have with other reasonably foreseeable actions; and (4) evaluates cumulative impacts potentially resulting from these interactions.

4.1 Definition of Cumulative Impacts

The approach taken in the analysis of cumulative impacts follows the objectives of NEPA, CEQ regulations, and CEQ guidance. Cumulative impacts are defined in 40 CFR 1508.1(g) as “effects on the environment that result from the incremental effects of the action when added to the effects of other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions. Cumulative effects can result from individually minor but collectively significant actions taking place over a period of time.”

In addition, CEQ and USEPA have published guidance addressing implementation of cumulative impact analyses to include *Guidance on the Consideration of Past Actions in Cumulative Effects Analysis* (CEQ, 2005), and *Consideration of Cumulative Impacts in EPA Review of NEPA Documents* (USEPA, 1999). The CEQ guidance *Considering Cumulative Impacts Under NEPA* (1997) says cumulative impact analyses should “...determine the magnitude and significance of the environmental consequences of the proposed action in the context of the cumulative impacts of other past, present, and future actions...identify significant cumulative impacts...[and]...focus on truly meaningful impacts.”

Cumulative impacts arise when a relationship exists between a proposed action and other actions expected to occur in a similar location and/or during a similar time period. To identify cumulative effects, the analysis addresses the following three fundamental questions.

- Does a relationship exist such that affected environmental components of the proposed action might interact with the affected environmental components of past, present, or reasonably foreseeable actions?
- If one or more of the affected environmental components of the proposed action and another action could be expected to interact, would the proposed action affect or be affected by impacts of the other action?
- If such a relationship exists, does an assessment reveal any potentially significant impacts not identified when the proposed action is considered alone?

4.2 Scope of Cumulative Impacts Analysis

The scope of the cumulative impacts analysis involves both the geographic extent of the effects and the timeframe in which the effects could be expected to occur. Cumulative impacts assess the impact of the proposed action when viewed in context with other past, present, and reasonably foreseeable actions. Past actions are considered part of the “baseline” analysis, unless they are incomplete or ongoing, and future actions are included where they are sufficiently certain to occur. The timeframe for cumulative impacts centers on the timing of the proposed action. Effects of past actions are reflected in current baseline conditions.

4.3 Past, Present, and Reasonably Foreseeable Actions

Actions included in the cumulative impacts analysis for MCB Hawaii Kaneohe Bay, MCTAB, and Pu'uloa RTF are shown in Table 4-1.

Table 4-1 Past, Present, and Reasonably Foreseeable Actions

<i>Index #</i>	<i>Action</i>	<i>Year</i>	<i>Description</i>
MCB Hawaii Kaneohe Bay			
1	Regimental Consolidated Communications/ Electrical Facility	2018–2022	<ul style="list-style-type: none"> Consolidation of facilities (20,423 square feet) in over seven facilities around the base.
2	Mōkapu Gate Entry Control AT/FP Compliance	2018–2022	<ul style="list-style-type: none"> Includes demolition; Building 1188 is under construction (2,800 square feet).
3	District CHW and DHW Plant for Buildings 7046, 6047, and 7057-7059	2020	<ul style="list-style-type: none"> Centralize water production to eliminate redundant chiller. New facility for the chiller pad, along with water lines (900 square feet).
4	Corrosion Control Hangar	2019–2023	<ul style="list-style-type: none"> Support paint stripping activities for tilt-rotor and rotary-wing aircraft (31,904 square feet).
5	Bachelor Enlisted Quarters (Aviation Support)	2020	<ul style="list-style-type: none"> Demolition: Walkways 1003, 1004, and 1005; Buildings 227, 228, 3000 and cooling plant (341,001 square feet).
6	Waikulu Family Housing	2018	<ul style="list-style-type: none"> Redeveloped into 375 three- and four-bedroom duplexes and multiplexes.
7	Hana Like Family Housing	2018	<ul style="list-style-type: none"> Redeveloped into 182 three- and four-bedroom duplexes and multiplexes.
8	Mōkapu Elementary School Campus Improvements	2023	<ul style="list-style-type: none"> Redevelopment of existing school campus for classrooms, administration, library, and cafeteria facilities, along with a covered play court, playfield, and surface parking lots (162,000 square feet).
9	Helicopter Squadrons Deactivation	2021–2022	<ul style="list-style-type: none"> AH-1/UH-1 squadron (27 aircraft) and the CH-53E squadron (15 aircraft) were deactivated, and the RQ-21 squadron was divested from the VMU squadron. Resulted in a decrease of approximately 841 personnel plus family members.
10	Airfield Guard Houses	2023	<ul style="list-style-type: none"> Relocate Guard Houses along Mōkapu Road.
11	Dog Kennel	2021	<ul style="list-style-type: none"> Construct a new dog kennel facility.
12	Rappel Tower and Gas Chamber	2021	<ul style="list-style-type: none"> Demolition: Building 6042. Reconstruct in place, total of 3,700 feet (larger than Building 6042).
13	Bachelor Enlisted Quarters	2022–2026	<ul style="list-style-type: none"> 180-person quarters. Buildings 1655 and 1656 (48,470 square feet).
14	Phase 1 Electrical Distribution Modernization, Base-wide	2022–2026	<ul style="list-style-type: none"> Repair and upgrade various components of the electrical distribution system, including substations, switching stations, and addition of SCADA System. Renovates primary substations 5033, 820, 5092 (13,681 square feet).
15	Bachelor Enlisted Quarters	2024–2028	<ul style="list-style-type: none"> 200-person quarters. Demolition: Building 386, 1634, and 1635 (47,620 square feet).

<i>Index #</i>	<i>Action</i>	<i>Year</i>	<i>Description</i>
16	WWTP Redundancy and Modernization	2025–2031	<ul style="list-style-type: none"> Upgrade the Base WWTP to provide redundant treatment systems to address State of Hawai'i recommendation and for contingency operations in case of failure of critical components. Demolition: Sludge Beds 977 and 978.
17	H-3 Main Gate Entry Control AT/FP Compliance	2025–2028	<ul style="list-style-type: none"> Demolition: Buildings 1636 and 1637. Reconstruct in place.
18	Maintenance Facility	2029	<ul style="list-style-type: none"> New consolidated maintenance facility and warehouse storage, and replacement van pads. Demolition: Van Pads C and D (53,733 square feet).
19	Phase 2 Electrical Distribution Modernization	2026–2030	<ul style="list-style-type: none"> Repair and upgrade various components of the electrical distribution system and upgrade substation 1125. Demolition: Building 1274.
20	KC-130J Refuel Pit	2031	<ul style="list-style-type: none"> New refuel pit for KC-130s.
21	Consolidated GCS Complex	2033	<ul style="list-style-type: none"> Construct new concrete pad, upgrade electrical power, install security fencing for GCSs.
22	Bachelor Enlisted Quarters	2031	<ul style="list-style-type: none"> 200-person Bachelor Enlisted Quarters to support new Aviation Squadrons and MWSS. This is the third part of original 608 Bed P-886. Demolition: Buildings 1604 and 1632.
23	Pless Hall Redevelopment	2033	<ul style="list-style-type: none"> Renovate Pless Hall.
24	Home Basing of the MQ-9 Marine Unmanned Aerial Vehicle Squadron and KC-130J Marine Aerial Refueler Transport Squadron	2023–2028	<ul style="list-style-type: none"> Home base a Marine Corps MQ-9 Marine Unmanned Aerial Vehicle Squadron (with an anticipated 6 aircraft) and a KC-130J Aerial Refueler Transport Squadron (with an anticipated 15 aircraft) at MCB Hawaii Kaneohe Bay. Conduct approximately 3,000 MQ-9 and 5,280 KC-130J annual aircraft operations. Station approximately 676 personnel plus dependents at MCB Hawaii Kaneohe Bay.
25	New Aircraft Hangar and Apron	2025	<ul style="list-style-type: none"> Replace Hangar 103 and construct a new parking apron.
26	KC-130J Wash Rack	2026	<ul style="list-style-type: none"> Construct a new wash rack for KC-130Js.
27	Flightline Security Fencing	2026	<ul style="list-style-type: none"> Repair existing flightline fencing. Construct new flightline fencing. Construct two new parking structures on 1st Street.
28	Air Traffic Control Company M Compound	2028	<ul style="list-style-type: none"> Facility for Air Traffic Control Company M with Company Headquarters, Operations Building, Operations Vehicle Laydown, Vehicle Maintenance Building, Van Pads, Communications Shop, and storage.
29	Alternate Communications Feeder	2030–2034	<ul style="list-style-type: none"> New communications ductbank.

<i>Index #</i>	<i>Action</i>	<i>Year</i>	<i>Description</i>
30	C-40 Aircraft Maintenance Hangar and Parking Apron	2025–2027	<ul style="list-style-type: none"> Construct and operate a modified Type III aircraft hangar at MCB Hawaii Kaneohe Bay with an aircraft apron and other supporting infrastructure modifications to support C-40A aircraft maintenance and operations. Demolish existing Hangar 104 and existing site elements.
MCTAB			
1	Perimeter Security Fence	2020	<ul style="list-style-type: none"> Install a perimeter fence around MCTAB.
Pu'uloa RTF			
1	Upgrade Pu'uloa Entry Control Facility	2025	Upgrade Pu'uloa Entry Control Facility at the Front Gate.
2	Upgrade Pu'uloa Entry Control Facility	2025	Upgrade Pu'uloa Entry Control Facility at the Back Gate.
3	EIS (2022), Pearl Harbor Naval Shipyard Dry Dock and Waterfront Production Facility	2023–2028	<ul style="list-style-type: none"> Construct and operate a graving dry dock and waterfront production facility at Pearl Harbor Naval Shipyard and Intermediate Maintenance Facility, including permanent auxiliary facilities and utilities. This proposed dry dock would replace existing Dry Dock 3.
4	HART Rail System	In Progress	<ul style="list-style-type: none"> 20-mile elevated urban rail transit system along the south shore of O'ahu between East Kapolei and Ala Moana Center. The first phase of the system, from East Kapolei to Aloha Stadium, is operational and open to the public as of late June 2023.
5	Wai Kai Lagoon and Surf Park	Complete	<ul style="list-style-type: none"> Recreation park next to Hoakalei Country Club. Water activities in 52-acre lagoon with a 100-foot-wide wave pool.

Legend: AT/FP = Anti-terrorism Force Protection; CHW = Chilled Water; DHW = Domestic Hot Water; EA = Environmental Assessment; EIS = Environmental Impact Statement; GCS = Ground Control Station; HART = Honolulu Area Rapid Transit; MCB = Marine Corps Base; MCTAB = Marine Corps Training Area Bellows; MWSS = Marine Wing Support Squadron; RTF = Range Training Facility; SCADA = Supervisory Control and Data Acquisition; VMU = Marine Unmanned Aerial Vehicle Squadron; WWTP = Wastewater Treatment Plant.

Source: MCB Hawaii, 2023c.

4.4 Cumulative Impact Analysis

Noise. The past, present, and future actions at MCB Hawaii Kaneohe Bay would include the use of construction equipment that would result in increased temporary intermittent noise levels within the affected environment. The timing of some future projects in Table 4-1 may overlap temporally and geographically with the construction period of the proposed action, which is scheduled to occur over an 8-year period. However, noise level increases would be temporary and typical of standard construction activities as identified in the noise resource section. While individual construction activities would temporarily increase noise levels in the construction area, the varied scale, location, and timing of future construction, and the relatively short duration of the proposed action noise effects, would result in less than significant cumulative impacts. The projects identified in Table 4-1 would have minimal training noise impacts at MCB Hawaii Kaneohe Bay, MCTAB, and Pu'uloa RTF as none of the Table 4-1 projects involve an increase in training activities at the three training areas. For these reasons, the proposed

action, when added to noise emissions from past, present, and future actions, would not result in significant construction or training cumulative noise impacts.

Air Quality. The projects listed in Table 4-1 using construction equipment would result in increased temporary air emissions of both criteria pollutants and GHGs in the affected environment similar to those described for construction in the Air Quality resource section. Future projects may overlap temporally and geographically with the construction period of the proposed action; however, the area is in attainment of the NAAQS for all criteria pollutants, and the incremental increase to air emissions identified for the proposed action would be well below threshold limits even when considered along with the projects in Table 4-1 (see Section 3.2, *Air Quality*). None of the projects in Table 4-1 are associated with ground-based training at MCB Hawaii Kaneohe Bay, MCTAB, and Pu'uloa RTF. For these reasons, the proposed action, when added to emissions from past, present, and future actions would not result in significant cumulative air quality impacts within the affected environment.

GHG Emissions. On January 9, 2023, the CEQ published the interim guidance, *National Environmental Policy Act Guidance on Consideration of Greenhouse Gas Emissions and Climate Change*. The guidance explains how agencies should apply NEPA principles and existing best practices to their climate change analyses.

Construction emissions are estimated to occur over an 8-year period. Annual Social Costs of Greenhouse Gas estimated societal damage costs for construction emissions would range from \$41,427 at 3% discount to \$183,655 for the 95th percentile, representing the worst-case value. Estimates for the total Social Costs of Greenhouse Gas emissions for all 8 years of construction emissions would range from \$375,755 to \$1,132,899 for 3% and the 95th percentile, respectively. Implementation of the proposed action would contribute to emissions of GHGs from the combustion of fossil fuels. For Alternative 1, the estimated annual Social Costs of Greenhouse Gas societal damage costs for emissions associated with training would range from \$925 in 2025 at 3% discount to \$4,261 in 2050 for the 95th percentile. For Alternative 2, the estimated annual Social Costs of Greenhouse Gas emissions associated with training would range from \$1,110 in 2025 at 3% discount to \$5,114 in 2050 for the 95th percentile of 3%. Emissions were estimated using assumed distances to training areas and the results are presented in Table 4-2. In addition to evaluating the total net change emissions per year, the estimated 25-year net change lifecycle emissions are also identified. For these reasons, the proposed action, when added to emissions from past, present, and future actions would not result in significant cumulative impacts with respect to GHG emissions.

Water Resources. The projects listed in Table 4-1 could have effects to water resources; however, all projects at MCB Hawaii Kaneohe Bay would be constructed in accordance with NPDES permit regulations, incorporate LID features to limit the increase in stormwater runoff, and incorporate standard BMPs such as those in the Storm Water Management Plan (MCB Hawaii, 2023b). None of the projects in Table 4-1 are associated with ground-based training at MCB Hawaii Kaneohe Bay, MCTAB, or Pu'uloa RTF. Finally, the proposed action does not involve an increase in personnel and thus would not contribute to any change in water usage. For these reasons, the proposed action would not result in significant cumulative water quality impacts within the affected environment.

Table 4-2 GHG Estimates for Operational Emissions

<i>Activity</i>	<i>CO₂e (Metric tons)</i>
Alternative 1	
Baseline Annual GHG total	49.9
25-year lifecycle emissions	1,247
Alt 1 Annual GHG total	16.3
25-year lifecycle emissions	408
Annual GHG net change	-33.5
25-year net change lifecycle emissions	-839
Alternative 2	
Baseline Annual GHG total	49.9
25-year lifecycle emissions	1,247
Alt 2 Annual GHG total	19.6
25-year lifecycle emissions	489
Annual GHG net change	-30.3
25-year net change lifecycle emissions	-757

Note: Values may not add up due to rounding.

Legend: CO₂e = carbon dioxide equivalent; GHG = greenhouse gas.

Cultural Resources. Past, present, and reasonably foreseeable future projects in Table 4-1 could adversely affect cultural resources within the Mōkapu House Lots Archaeological District at Pali Kilo, the NAS Kaneohe Bay Administration District, and the Waimānalo Archaeological District. All the projects with a federal nexus have been or would be reviewed under NHPA Section 106 to determine effects to historic properties. The proposed action does not adversely affect historic properties and would not result in significant impacts to cultural resources. For these reasons, the proposed action would not result in significant cumulative impacts to cultural resources within the affected environment.

Terrestrial Biological Resources. While the proposed action along with the activities in Table 4-1 contribute to the continued urban buildup of the Mōkapu Peninsula, construction-related projects would occur at previously developed and actively used areas. Construction noise would be temporary and, in many cases, would be similar to operational activities that currently occur throughout the installation. In addition, BMPs identified in Table 2-4 would be applied to future projects to further avoid or minimize potential effects to wildlife (including ESA-listed species) during the construction. BMPs to educate contractors and military personnel about natural resources and ESA-listed species would also continue to be implemented. The projects in Table 4-1 are largely upgrades to or replacement of existing infrastructure; therefore, the nature of the projects would not significantly introduce new noise sources nor significantly increase the amount of impervious surfaces at MCB Hawaii Kaneohe Bay. Regarding a cumulative increase in barbed wire on Mōkapu Peninsula, which poses a risk of entanglement for the Hawaiian hoary bat, proposed fencing would minimize use of barbed wire fencing (Table 2-4). None of the projects in Table 4-1 are associated with ground-based training at MCB Hawaii Kaneohe Bay, MCTAB, and Pu'uloa RTF. For these reasons, the proposed action would not result in significant cumulative impacts to terrestrial biological resources in the affected area.

Public Health and Safety. Future construction activities at MCB Hawaii Kaneohe Bay, MCTAB, and Pu'uloa RTF identified in Table 4-1 would consist of activities similar to the proposed action and would occur entirely within installation and training area boundaries. No public safety effects would occur with these projects as they are all located on base and at least 0.5 mile from the nearest community (Kailua).

The proposed perimeter fencing at MCTAB and entry control facilities upgrades at Pu'uloa RTF would enhance security at these locations, so this would not adversely affect public health and safety. No reasonably foreseeable actions are located near MCTAB. Some reasonably foreseeable construction projects occur outside of the Pu'uloa RTF, but the proposed action involves only a continuation of training at this location at same type and tempo as existing training. This would have no change to public safety outside the range and would not overlap with changed traffic volumes associated with other reasonably foreseeable actions. Use of radars associated with modernized equipment would be identical to current radar use at MCB Hawaii Kaneohe Bay, MCTAB, and Pu'uloa RTF. The radar systems would continue to be used within range boundaries and at minimum distances from military personnel, ordnance, and fuel to meet safety requirements. For these reasons, the proposed action would not result in significant cumulative public health and safety impacts within the affected area.

Transportation. Transportation associated with MCB Hawaii Kaneohe Bay construction projects may overlap in time with those in some of the projects in Table 4-1 and may contribute to traffic on roadways on H-3. Any increase, even from multiple projects including the perimeter fencing project at MCTAB, is not anticipated to be significant. The construction portion of the proposed action would increase average daily traffic volume on H-3 less than 1%. At any given time, no more than three construction projects would be underway, including the proposed action. Even at three times the volume, the proposed construction component would still represent a very small percentage increase above existing average daily traffic volume on H-3. As such, construction would not result in a significant cumulative impact. Regarding training activity, none of the projects in Table 4-1 are associated with ground-based training at MCB Hawaii Kaneohe Bay, MCTAB, and Pu'uloa RTF and would not add operational traffic to public roadways. While increased traffic at 'Ewa Beach would occur due to reasonably foreseeable actions such as the Wai Kai Lagoon and Surf Park, the existing intersections were projected to continue operating at acceptable levels during weekday morning and afternoon peak periods (Honokea Kalaeloa, LLC, 2023). In addition, the Honolulu Area Rapid Transit rail project is designed to reduce roadway traffic, which could potentially result in less traffic commuters to/from 'Ewa Beach using the Honolulu Area Rapid Transit rail system. For these reasons, the proposed action would not result in significant cumulative impacts to transportation.

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