ENVIRONMENTAL ASSESSMENT

REDEVELOPMENT OF MARFORPAC HQ/OPS CENTER

Camp H.M. Smith
Oahu, Hawaii

Marine Corps Base Hawaii
April 2016

Summary

Type of Document	Environmental Assessment (EA)
Title of the Proposed Action	Redevelopment of MARFORPAC HQ/OPS Center
Lead Agency	Department of the Navy
Action Proponent	Marine Corps Base (MCB) Hawaii
Location of the Proposed Action	Camp H.M. Smith, Honolulu, Hawaii
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This EA was prepared pursuant to the National Environmental Policy Act of 1969 (NEPA), as amended (42 United States Code [U.S.C] 4321 et seq.), its implementing regulations issued by the Council on Environmental Quality (CEQ) (40 Code of Federal Regulations [CFR] Part 1500 - 1508), Marine Corps Order 5090.2A (with Change 3, 26 Aug 2013), and the United States Marine Corps (USMC) NEPA Manual (Version 2 of September 2011).

Marine Corps Base Hawaii (MCB Hawaii) proposes to redevelop the Headquarters (HQ) and Operations (OPS) Center for Marine Corps Forces, Pacific (MARFORPAC) at Camp Smith, Oahu, Hawaii. The existing Building 1 Complex would undergo new construction, renovation, and demolition work to develop the new MARFORPAC HQ/OPS Center.

Several Action Alternatives were considered and three were analyzed in detail in this EA. All of the Action Alternatives can be characterized as infill redevelopment which would occur on the same site as the present Building 1 Complex and generally serve the same function as the existing facility when completed. All of the Action Alternatives would involve various degrees of new construction, renovation, and demolition. Each of the alternatives would utilize about 367,500 gross square feet (GSF) of area and would result in a foot print which would be approximately 15,000 GSF smaller than the existing Building 1 Complex.

Implementation of the proposed action (Configuration 2) is estimated to take approximately ten years to complete, include three major phases of new construction to minimize impacts to operations, and maximize the use of existing building space to accommodate personnel who are temporarily displaced by new construction and renovation work. New construction would occur first, followed by renovation, and then demolition, once “swing space” is no longer needed.

The action alternatives would minimize operational impacts during construction and, upon completion, would provide MARFORPAC with a new HQ/OPS Center that would optimize operational efficiency and address force protection requirements.

Environmental impacts would generally be limited to short-term effects on air quality and noise, and increased potential for storm water runoff and soil erosion. Construction activities would affect the availability of parking at Camp Smith and would temporarily disrupt local traffic on Halawa Heights Road and within the Camp. Appropriate Best Management Practices (BMPs), compliance with applicable regulatory requirements, and implementation of interim mitigation measures (*e.g.,* traffic/parking management) would minimize these temporary, construction-related impacts.

The Hawaii Coastal Zone Management Office has acknowledged that the proposed action is an activity that is covered by the Navy and Marine Corps *de minimis* list under the Coastal Zone Management Act.

During the National Historic Preservation Act (NHPA) Section 106 consultation process, MCB Hawaii determined that the demolition of eight NRHP-eligible buildings under the proposed action would have an adverse effect on historic properties including the larger Building 1 Complex. The Section 106 review process included a series of meetings with the State Historic Preservation Officer (SHPO), the Advisory Council on Historic Preservation (ACHP), the National Trust for Historic Preservation (NTHP), and the Historic Hawaii Foundation (HHF). Through the NHPA Section 106 process, the consulting parties determined that specific mitigation measures could offset adverse effects to historic properties. Those specific mitigation measures are documented in a Memorandum of Agreement (MOA) between MCB Hawaii, the SHPO, and the ACHP, with HHF signing as a concurring party (See Appendix A).

The MOA includes provisions to document the buildings proposed for demolition and sets forth design guidelines and mitigation measures to be implemented during the development of the project. The MOA also includes provisions for a parking study, stipulates the future location of a parking structure to the rear (north) of the new MARFORPAC HQ/OPS Center, and allows an open space area created by the demolition of Building 2C to be used for parking until a parking structure is constructed. In a continuance of the Section 106 consultation, MCB Hawaii determined that the Building 1 Complex was not eligible for listing as a historic district because it lacked integrity, while acknowledging that the individual buildings that comprise the Building 1 Complex (Buildings 1, 1A, 1B, 2AA, 2C, 2D, 3A, 3AA, 3B, 4, 5, and 5A), with their settings (*e.g.,* courtyards, landscaping, grassy/paved areas, open space), remained eligible for listing. The SHPO concurred with the determination by letter dated October 30, 2015. The HHF also concurred after requesting and receiving clarification on the MCB Hawaii determination. The ACHP and NTHP did not provide comments. The EA analysis found that the mitigation measures set forth in the MOA would reduce the impacts to historic properties to less than significant levels.

The operation of the new HQ/OPS Center is not expected to result in any significant, long-term impacts upon the natural or manmade environment. The No-Action Alternative would not have any long-term, adverse environmental impacts because existing site conditions would continue.

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Acronyms and Abbreviations

§	Section
ACHP	Advisory Council on Historic Preservation
AHNH	Aiea Heights Naval Hospital
APE	Area of Potential Effect
AT/FP	Anti-Terrorism/Force Protection
BEQ	Bachelor Enlisted Quarters
BMP	Best Management Practices
CCH	City and County of Honolulu
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
COC	Command Operations Center
CNRH	Commander, Navy Region Hawaii
CZM	Coastal Zone Management
dBA	Sound pressure level in decibels
DoD	Department of Defense
DOH	State of Hawaii, Department of Health
DoN	Department of the Navy
EA	Environmental Assessment
ECP	Entry Control Point
EPAct 2005	Energy Policy Act of 2005
ft.	Feet or Foot
GHG	Greenhouse gas
GSF	Gross Square Feet
HE	Hawaiian Electric

HHF	Historic Hawaii Foundation
HLR	Historic Landscape Report
HQ	Headquarters
HVAC	Heating, Ventilating, and Air Conditioning
JIATF-W	Joint Interagency Task Force-West
LEED	Leadership in Energy and Environmental Design
LID	Low Impact Development
MARFORPAC	U.S. Marine Corps Forces, Pacific
MCB Hawaii	Marine Corps Base Hawaii
MCO	Marine Corps Order
MOA	Memorandum of Agreement
mph	Miles per hour
NAVFAC PAC	Naval Facilities Engineering Command, Pacific
NEPA	National Environmental Protection Act
NHPA	National Historic Preservation Act
NPDES	National Pollutant Discharge Elimination System
NPS	National Park Service
NRHP	National Register of Historic Places
NTHP	National Trust for Historic Preservation
OPS	Operations
SHPO	State Historic Preservation Officer
SOCPAC	Special Operations Command Pacific
SOI	Secretary of the Interior
UFC	Unified Facilities Criteria
UPS	Uninterruptible Power Supply
USCINCPAC	Commander in Chief, U.S. Pacific Command
USMC	U.S. Marine Corps
USPACOM	U.S. Pacific Command

Chapter 1 Purpose and Need for Action

This Environmental Assessment (EA) addresses the redevelopment of the existing Marine Corp Forces, Pacific (MARFORPAC) headquarters (HQ) and operations (OPS) facility at Camp Smith, Hawaii.

1.1 Summary of the Proposed Action

The Building 1 Complex is prominently located near the center of Camp Smith, Oahu, Hawaii (See Figures 1-1 to 1-3). The existing Building 1 Complex encompasses 382,192 gross square feet (GSF) and consists of 12 interconnected buildings: Buildings 1, 1A, 1B, 2AA, 2C, 2D, 3A, 3AA, 3B, 4, 5, and 5A. Other buildings affected by the proposed action include Buildings 6, 17, 80, 81, and 82 (See Figure 1-3). With the exception of Buildings 6, 17, and 82, all the other buildings are interconnected as one building and are eligible for listing on the National Register of Historic Places (NRHP).

The proposed action would involve changes to the existing Building 1 Complex: renovation of approximately 182,000 GSF; demolition of approximately 197,000 GSF and new construction of approximately 185,500 GSF for a new total of 367,500 GSF. Implementation of the proposed action is estimated to take approximately 10 years and include three phases of new construction to maximize available swing space[1] and minimize impacts to operations.

The completed MARFORPAC HQ/OPS Center would be a more compact physical space that creates a more secure and consolidated operational command core and fosters preferred functional relationships for its major occupants.

1.2 Background

All of Camp H.M. Smith, including the existing Building 1 Complex, was established in 1941 as the Aiea Heights Naval Hospital (AHNH). By 1944, it was the first notable industrial occupational therapy military hospital outside the continental United States. MARFORPAC has been headquartered in the Building 1 Complex since 1955. Through the decades, portions of the Building 1 Complex have been renovated and interior space has been reconfigured to accommodate use by United States Pacific Command (USPACOM), MARFORPAC, and other Department of Defense commands.

The need for adequate, consolidated, and efficiently configured space for the tenants of the Building 1 Complex prompted the development of the "Building 1 Complex Reuse and Renovation Plan *(*2002)." The objectives of this plan were to create a secure facility and consolidate tenants and operations into permanent concrete portions of the headquarters complex, improve the working environment, and enhance operational relationships. Parts of the plan were implemented; however, the commands found that they were still not able to effectively operate within the old hospital wing configurations.

In 2004, most USPACOM personnel moved to the newly completed Nimitz-MacArthur Pacific Command Center (Building 700) located across Elrod Road from the Building 1 Complex (See Figure 1-3). Some USPACOM personnel remained in the MARFORPAC headquarters, including directorates of the Special Operations Command Pacific (SOCPAC) and the Joint Interagency Task Force-West (JIATF-W), hereafter "Joint Command*."*

[1] existing space used temporarily until new space is constructed

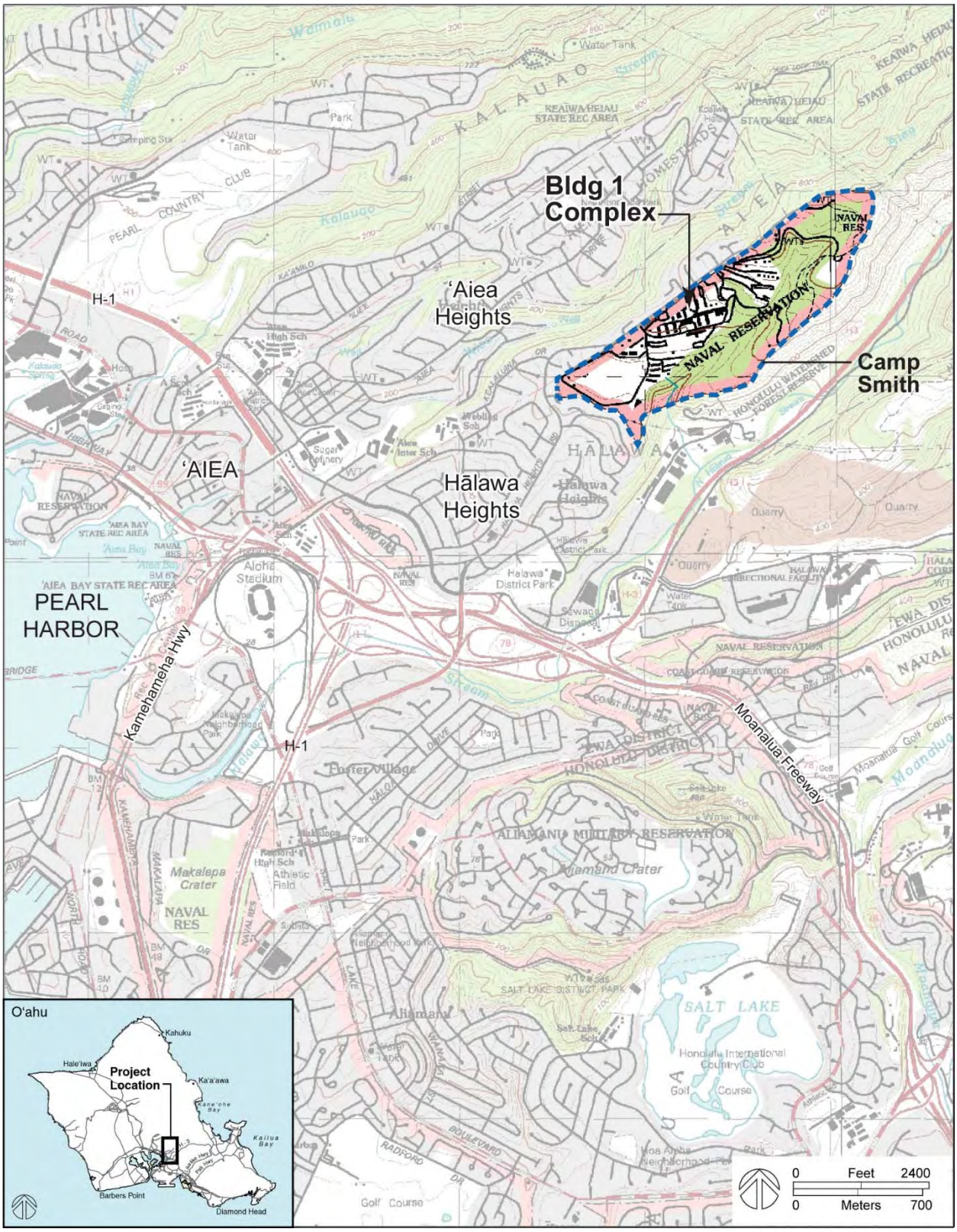

Figure 1-1: Regional Location Map

Figure 1-2: Project Area Location Map

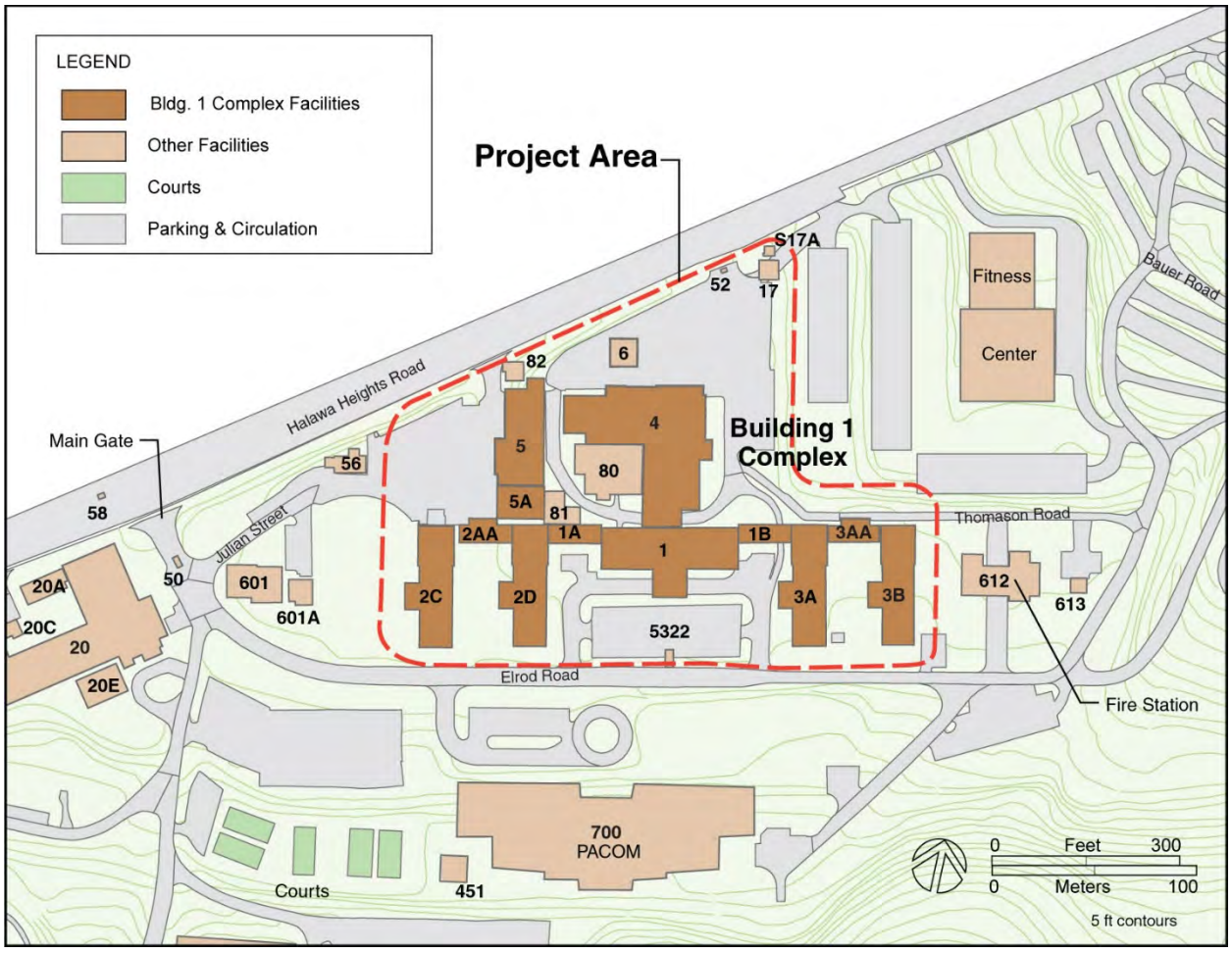

Figure 1-3: Building 1 Complex and Adjacent Area

A new Physical Fitness Center opened in 2014 to the northeast of Building 1, in the same location that a MCB Hawaii internal planning study in 2002 designated for a new MARFORPAC Operations Facility (See Figure 1-3).

MCB Hawaii internal planning studies have explored the feasibility of reusing existing Building 1 Complex facilities as well as constructing new facilities, in the interest of supporting the MARFORPAC mission. A range of configurations from reuse to new construction on the site and at another Camp Smith site (Bordelon Field) were considered. Three configurations were reviewed as part of the National Historic Preservation Action (NHPA) Section 106 consultation process, memorialized in the Memorandum of Agreement (MOA) presented in Appendix A. Configuration 1 represents the option with the most new construction and the least reuse, while Configurations 2 and 3 include different degrees of reuse and new construction. A fourth configuration evaluated the potential for almost complete reuse and was found to be infeasible, a finding concurred to by the consulted parties.

MCB Hawaii supported Configuration 1 as its preferred alternative at the start of the Section 106 process since it best fulfilled MARFORPAC's priorities for a new HQ/OPS Center. However, due to the historic preservation concerns expressed by the consulting parties during Section 106 consultation, MCB Hawaii accepted the consensus position that Configuration 1 was not acceptable and that Configuration 2 was an acceptable and more supportive alternative.

1.3 Purpose and Need for Action

The purpose of the action is to provide an adequate, consolidated, and efficiently-configured operations facility for MARFORPAC, the largest field command in the U.S. Marine Corps, and for the Joint Command. Existing facilities do not support the effective accomplishment of MARFORPAC's mission. For MARFORPAC, an adequate facility at Camp Smith is one that fulfills the space requirements for MARFORPAC, the Joint Command, and other tenants of the existing Building 1 Complex. For MARFORPAC, an adequate facility at Camp Smith is one that meets the space requirements of its major occupants and provides a consolidated and efficiently configured facility with approximately 368,000 GSF where the commands with day-to-day operational responsibilities would be located in close proximity to one another. These types of functional relationships, including co-location and proximity, can only be effective with adequately sized floor areas. The proposed action would provide an innovatively designed command and control facility that incorporates the necessary functional relationships to effectively perform these mission-critical activities.

The action is needed to more efficiently and effectively carry out MARFORPAC's mission. Since 1955, MARFORPAC has been headquartered at the former AHNH, now known as the Building 1 Complex. The pavilion style architecture of the old hospital, with its extended corridors and wings, is not conducive to MARFORPAC's command and control mission. The size and aspect ratios of the building's floors and the configuration of the existing Building 1 Complex contribute to the fracturing of commands that share important functional relationships. The numerous wings necessitate multiple control and security access points which lead to inefficiencies and potential breaches of security. In addition, the current Building 1 Complex suffers from many utility and building deficiencies due to its age and configuration.

1.4 Potential Permits, Approvals, and Required Consultations

As part of the National Environmental Policy Act (NEPA) compliance process, the Department of the Navy (DoN) has engaged in coordination, consultation, and permitting with regulatory agencies to ensure that all applicable laws, rules, regulations, and policies have been satisfied with respect to the proposed action.

Table 1-1 summarizes the permits, approvals, and required consultations DoN or its contractor may be required to obtain prior to construction.

Table 1-1: List of Potential Permits, Approvals, and Required Consultations

Oversight Agency/Stakeholders	***Permit, Approval, or Consultation***
State of Hawaii, Department of Health, Clean Water Branch	National Pollutant Discharge Elimination System (NPDES) Permit
State of Hawaii, Department of Health, Clean Air Branch	Air Quality Permit
State of Hawaii, Department of Business, Economic Development, and Tourism, Office of Planning	Coastal Zone Management Act (CZMA) concurrence
MCB Hawaii	Site approval
State of Hawaii, Historic Preservation Officer (SHPO), Advisory Council on Historic Preservation (ACHP), National Trust for Historic Preservation (NTHP), interested parties, and the public	NHPA Section 106 consultation

1.5 Public Participation

In accordance with Department of Defense (DoD) and DoN policies and instructions for implementing NEPA, public comments were solicited for the EA and copies of the EA were available on the Internet. Notice of Availability (NOA) of the EA was published in the Honolulu Star Advertiser, a newspaper with statewide distribution, and in the Environmental Notice, the bi-monthly publication of the State of Hawaii, Office of Environmental Quality Control. All comments received during the EA comment period were fully considered by the DoN prior to rendering a decision on the proposed action.

Chapter 2 Proposed Action and Alternatives

This chapter presents a discussion of the action alternatives, including the proposed action, and a summary of the environmental consequences of the alternatives. Alternatives to the proposed action must be considered in accordance with NEPA Council of Environmental Quality (CEQ) regulations for implementing NEPA, Marine Corps Order (MCO) 5090.2A (with Change 3, 26 Aug 2013), and the U.S. Marine Corps (USMC) NEPA Manual (Version 2 of September 2011). However, only those alternatives determined to be reasonable require detailed analysis (*i.e.,* alternatives that are reasonable relative to their ability to fulfill the purpose and need for the project, as well as practical and feasible from an operations, technical and economic standpoint). Two alternatives (Configurations 1 and 3) were identified that present reasonable choices to the proposed action (Configuration 2) and were carried through the environmental analysis. Configuration 4 was considered and dismissed because it did not meet the purpose and need (see discussion in Section 2.3.1). In addition to the proposed action and reasonable alternatives, the No-Action Alternative was carried through the environmental analysis in compliance with CEQ requirements.

Configuration 1 Alternative: This alternative was identified by the MARFORPAC Commanding General as the configuration that "provided the best solution to optimize operational efficiency and security requirements." This is the operationally preferred alternative because it involves the most purpose-built construction, provides the greatest amount of consolidation, and the most efficient configuration, and renovates and preserves the Building 1 core. In addition to new construction, Configuration 1 would involve the renovation of two buildings that are eligible for listing on the NRHP, and the demolition of 15 buildings, including 12 that are eligible for listing.

Configuration 2 (Proposed Action): This alternative was identified during the NHPA Section 106 process as a compromise between the operational efficiencies provided in Configuration 1 and reducing the loss of historic buildings. In addition to new construction, the proposed action would include the renovation of six NRHP eligible buildings, and the demolition of 11 buildings, including eight that are eligible for listing. Measures to mitigate adverse effects to the historic properties are included in an NHPA Section 106 MOA in Appendix A. The measures included in the MOA would reduce the impact to the larger Building 1 Complex to less than significant levels. The reconstructed Building 1 Complex would have a more compact and efficient footprint that creates a more consolidated operational command core and fosters preferred relationships between MARFORPAC, the Joint Command and USPACOM (other major Camp Smith tenants). The proposed action follows the principles of adaptive reuse by preserving important historic properties eligible for listing on the NRHP while fulfilling mission requirements for MCB Hawaii, and has received the conditional support of the NHPA Section 106 consulting parties.

Configuration 3 Alternative: This alternative reuses more of the existing buildings. In this alternative, more renovation would occur than demolition or new construction. For example, seven NRHP-eligible buildings would be renovated, and 10 buildings would be demolished, including seven that are eligible for listing. It is slightly less operationally efficient than the proposed action because of the higher proportion of reused floor area, but it is also less expensive due to the higher proportion of reuse. Configuration 3 is essentially the same as the proposed action except that it includes adaptive reuse of Building 4, a large NRHP-eligible building near the center of the Building 1 Complex.

No-Action Alternative: Under the No-Action Alternative, MARFORPAC and the Joint Command would continue to operate in a former hospital that is over 70 years old with outmoded buildings and

significant operational and security limitations. There would be no demolition, new construction, or renovation as described under the action alternatives. The No-Action Alternative would not meet the project objectives, nor support the purpose and need for the action. However, it is carried through the analysis to comply with CEQ requirements (40 Code of Federal Regulations [CFR] Part 1500 - 1508) and to provide a baseline to compare the magnitude of environmental effects of the action alternatives.

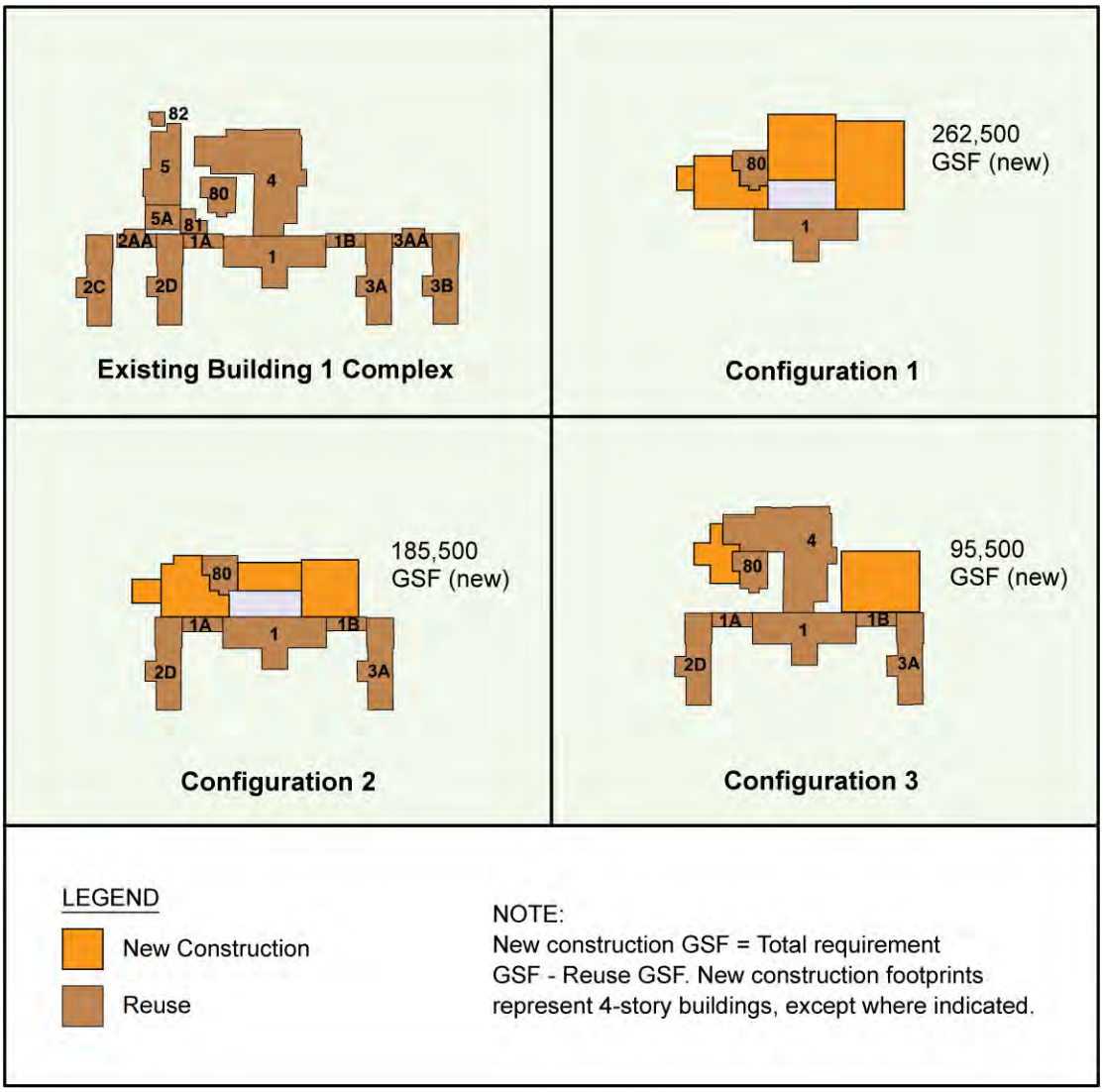

Figure 2-1: Existing Building 1 Complex and Configurations 1, 2, and 3

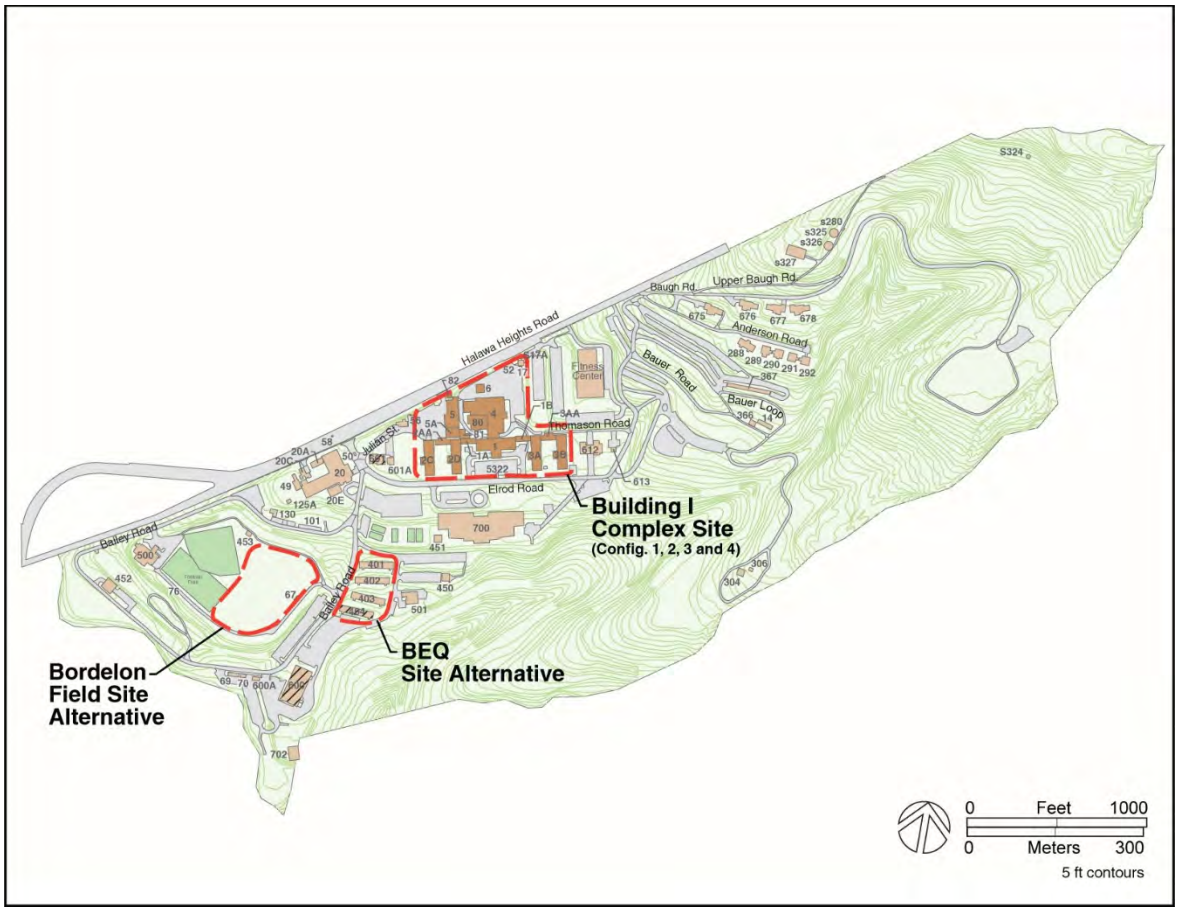

Figure 2-2: Location of the Alternatives analyzed at Camp Smith

2.1 Description of the Proposed Action and Alternatives

This section describes the alternatives that were carried through the environmental analysis.

Marine Corps Base Hawaii (MCB Hawaii) proposes to construct a new MARFORPAC HQ/OPS Center at Camp Smith, Oahu, Hawaii (See Figures 1-1 to 1-3). The project, which encompasses the Building 1 Complex is approximately) 10.5 acres in size. Under the proposed action (Configuration 2), the existing Building 1 Complex would undergo new construction, renovation, and demolition work to develop the new HQ/OPS Center.

The action alternatives were considered in accordance with NEPA, CEQ regulations for implementing NEPA, MCO 5090.2A, and the USMC NEPA Manual. MCB Hawaii identified the following development objectives for the MARFORPAC HQ/OPS Center. The new facility must:

- Utilize the existing Building 1 Complex to facilitate functional relationships between MARFORPAC and USPACOM.
- Incorporate both MARFORPAC and Joint Command requirements.
- Provide a functionally efficient configuration that meets the security requirements of the Building 1 Complex tenant commands.
- Balance preservation of historic properties with new construction on the site.

The three configurations presented in this section represent a range of new construction and building reuse. Configuration 1 includes the most new construction and the least building reuse, while Configuration 3 has the least new construction and the most reuse. For all configurations, Building 1 and its port cochere are retained as the main entry and traditional flag location for the MARFORPAC Commanding General.

All new construction and renovations would conform to current building code requirements and anti-terrorism/force protection (AT/FP) standards, and incorporate federal building performance and sustainable design requirements. In accordance with the MOA, the design of the new buildings would provide for the integration of historic character-defining features and be sensitive to and compatible with the existing Building 1 Complex. To minimize the visual impact to the existing Building 1 Complex, the height of the new buildings would not exceed four stories and their exterior design would be consistent with the elevations of the existing Building 1 Complex. All rehabilitation work on NRHP-eligible buildings would be designed and executed in accordance with the Secretary of the Interior's (SOI) "Standards for the Treatment of Historic Properties" with guidelines for preserving, rehabilitating, restoring, and reconstructing historic buildings.

2.1.1 Proposed Action (Configuration 2)

The proposed action (Configuration 2) involves levels of new construction, renovation, and demolition that fall between Configurations 1 and 3. Configuration 2 addresses MARFORPAC's objectives for the new Building 1 Complex by providing appropriate internal security design features and incorporating efficient pedestrian and vehicular circulation. In addition, it effectively consolidates and optimizes functional relationships, complies with AT/FP requirements, minimizes construction impacts on existing operations, and adequately addresses the reuse of existing buildings.

Under this alternative, two of the Building 1 Complex's historic wings (along Elrod Road) would be retained and renovated while new construction would create new space that is more operationally efficient and configured to the standards and requirements set forth by MARFORPAC. When completed, the proposed action would encompass approximately 367,500 GSF, a slightly smaller footprint than the existing Building 1 Complex, and would be more compact and secure (See Figure 2-3). The characteristics of the proposed action/Configuration 2 are described below, illustrated in Figure 2-4, and summarized in Table 2-1.

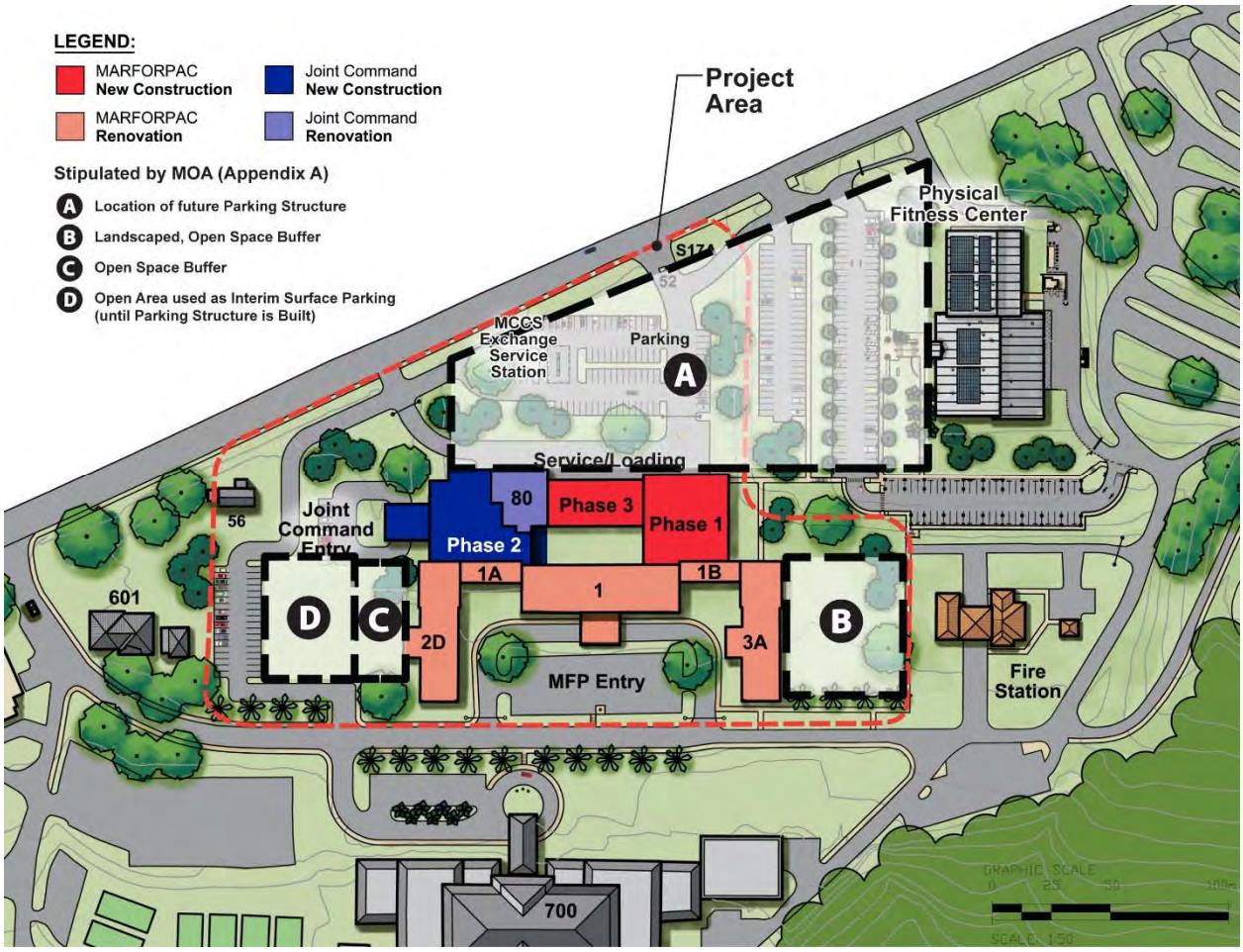

Figure 2-3: Conceptual site/phasing plan for the Proposed Action (Configuration 2)

New Construction: For the proposed action, approximately 185,500 GSF of new space would be added to a newly designed headquarters and operations center at the Building 1 Complex. New construction would be located to the rear (on the Halawa Heights Road side) of the Building 1 Complex to retain views of the historic building from Elrod Road to the extent possible. The new construction would be compatible with the adjoining Building 1 Complex in terms of scale, massing, and exterior materials. The design of all new buildings would be guided by the former hospital buildings' character-defining features although they would be distinct as new buildings. The new construction would not exceed four stories in order to minimize visual impact to the Building 1 Complex. The scale, proportion and architectural detailing of exterior doors and windows in the new Annex would match that of the existing buildings, yet would also comply with AT/FP design criteria.

Renovation and Historic Preservation: The proposed action calls for renovation of approximately 182,000 GSF of existing space. The original naval hospital administrative center, Building 1, would be renovated along with the attached corridors and wings (Buildings 1A, 1B, 3A, 2D). The Building 1 Complex would maintain simple rectilinear building shapes, windowed corridors and porte cochere at the entry. The roofline would remain flat and the exterior of the building would retain its smooth concrete surfaces. In addition, the Cold War-era operations center, Building 80, would also be retained as a windowless concrete building; however it would be integrated into the new MARFORPAC HQ/OPS Center and would no longer be freestanding.

All new exterior doors and windows of the NRHP-eligible buildings (1, 1A, 1B, 2D, and 3A) would comply with the SOI's Standards for rehabilitation and historic preservation guidelines as stipulated in the MOA, current building codes and AT/FP design criteria, with the overall intent to maintain the historic character of the WWII hospital.

Demolition: The proposed action calls for the demolition of several NRHP-eligible buildings associated with the former naval hospital**,** including two external wings (Buildings 2C and 3B), two corridors (Buildings 2AA and 3AA), a subsistence building containing a kitchen and cafeteria (Building 4), a powerhouse and laundry building (Building 5), and a central supply room (Building 5A). Another NRHP-eligible structure proposed for demolition is a former Cold War-era communications support building (Building 81). Buildings scheduled for demolition which are not eligible for the NRHP include a former WW II-era garage (Building 6) and administrative storage (Building 17) and a former Cold War-era "no break" power station (Building 82). Approximately 197,000 GSF of eight NRHP-eligible buildings would be demolished under the proposed action.

Measures to mitigate the demolition of the NRHP-eligible buildings are set forth in the MOA and include the development of a Historic Landscape Report (HLR) in accordance with "National Park Service Guide to Cultural Landscape Reports" and the SOI's Standards with guidelines for the treatment of historic landscapes. The HLR is being prepared by an SOI-qualified historic landscape architect and would serve as mitigation for the demolition of the former hospital's two wings. To document the historic properties prior to the start of construction and/or demolition, a Historic American Building Survey report and photo documentation would be prepared by an architectural historian or historical architect who meets SOI Qualification Standards.

Phasing: The proposed action, including its new construction, renovation, and demolition components, is expected to take 10 years due to the complexities of maintaining full operational readiness and performance during the construction process, within the confines of a compact construction site. The extended construction period adds to the overall cost of the facility due to construction cost escalation. New construction would be divided into three major phases to allow continued operation and facilitate temporary relocation of tenants. The operations center component of the new HQ/OPS Center would be constructed first and personnel would move into that facility while their existing space is renovated. The number of tenants displaced at any one time would be limited to the amount of available swing space. Each new group moving into a swing space would temporarily adapt the space for their use as necessary. As each new space is completed, the temporary relocation process would be repeated until the entire project is completed. This sequential process, and the need to maintain buildings, services, security, and tenant support**,** adds to the construction time frame. Renovation would occur after new construction and would be followed by demolition after swing space is no longer needed.

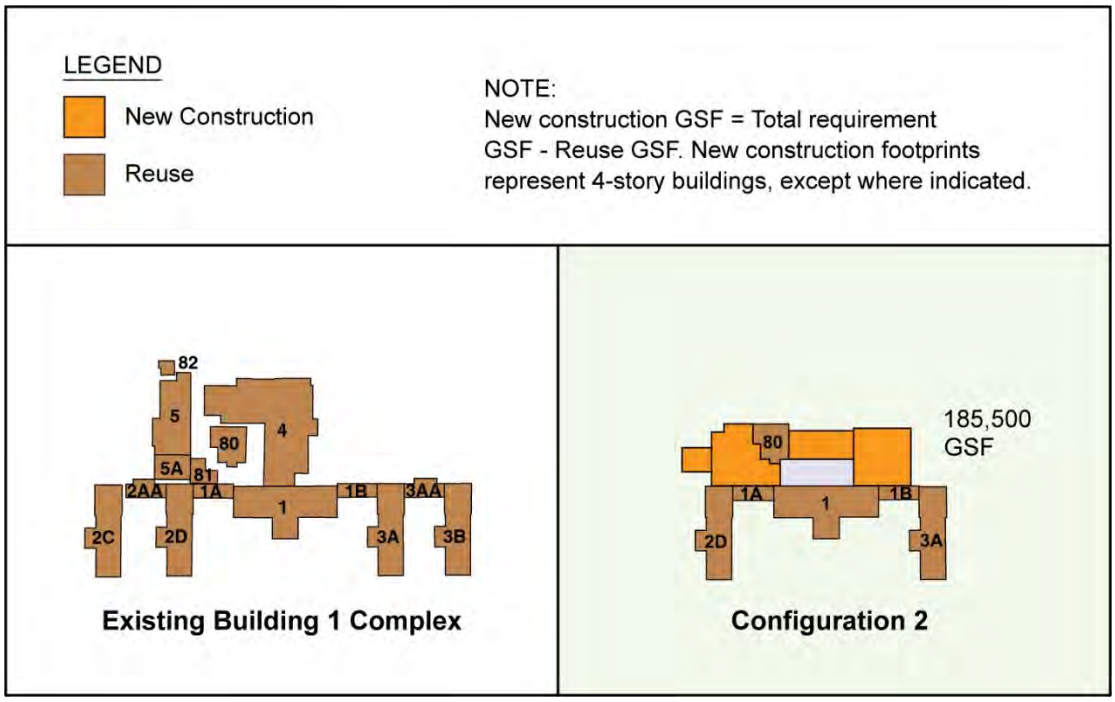

Figure 2-4: The Proposed Action (Configuration 2) would reuse historic hospital wings while constructing new operations centers on the north side of the Building 1 Complex.

Table 2-1: Summary Characteristics of the Proposed Action (Configuration 2)

Category	*Description*
Estimated Construction Period	10 years
New Construction	185,500 GSF
Renovation	182,000 GSF, including 6 NRHP-eligible Buildings 2D, 1A, 80, 1, 1B, and 3A
Demolition	197,000 GSF of 8 NRHP-eligible buildings (from west to east, typical), including 2C, 2AA, 5A, 5, 81, 4, 3AA, 3B; 3,000 GSF of 3 non-eligible buildings: 6, 17, 82
Footprint Reduction	15,000 GSF
Parking (Net Change)	15-stall increase
Phasing	3 phases of new construction; renovation follows new construction; demolition follows renovation once swing space is no longer needed

Proposed Improvements: The infrastructure serving the existing Building 1 Complex would need to be upgraded in order to implement the proposed action. A summary of proposed improvements is provided below.

Water Supply. The water system for the existing Building 1 Complex would need to be completely replaced as part of the redevelopment project. The existing potable water storage system would be converted to a modern system to stabilize water pressure throughout the new building. While the building's present plumbing system meets basic plumbing code requirements, the aged system does not comply with current water conservation standards and would need to be replaced to meet Leadership in Energy and Environmental Design (LEED) 2009 and Environmental Protection Agency (EPA) Act 2005 requirements. In addition, routing the water lines around the perimeter of the new building would help ensure adequate water flow and pressure. Additional water saving can be achieved by using low-flow

fixtures, drought-tolerant plant materials and employing water-efficient irrigation practices. Existing utilities would be maintained for all the buildings that are used as swing space during the renovation process.

Wastewater. The wastewater system for the existing Building 1 Complex is very old and would be replaced with new sewer pipes made with modern materials. Existing utilities would be maintained for all the buildings that are used as swing space during the renovation process.

Stormwater Drainage. The existing drainage system transports rain water from Building 1 Complex roofs into the underground storm drain system where it is routed below the building and conveyed into a storm main on Elrod Road. The drainage system would be completely replaced and be sized to handle the runoff from the new roof areas. A series of buried catchment basins would be installed to dampen and control offsite surface flows. The drainage system would be designed to accommodate runoff from a 50-year, one-hour storm. Depending on the Action Alternative, existing drain pipes would be redirected around the complex to replace the main drain pipe in the driveway below Building 1B. Existing utilities would be maintained for all the buildings that would be used as swing space during the renovation process.

Electrical. A new central utility hub would be built to provide service during new construction and renovation. The new central hub would be more energy efficient, reduce maintenance and repairs, prolong equipment life, and allow future expansion and/or renovation. The main electrical room would be co-located with a new centralized mechanical plant. Other key improvements include:

- Removing all existing electrical services and providing a new central main electrical room.
- Replacing all existing electrical distribution systems in all buildings that are to remain.
- Installing new energy-efficient lighting fixtures that conform to LEED 2009 and Energy Policy Act of 2005(EPAct 2005) standards.
- Providing a parallel redundant uninterruptible power supply (UPS) system to provide power during outages, accommodate critical loads, and provide capacity for future expansion.
- Providing a central emergency power plant.
- Providing infrastructure for a future roof-mounted photo-voltaic (PV) system and allocate floor space for inverters.

Existing utilities would be maintained for all the buildings that are used as swing space during the renovation process.

Heating, Ventilation, and Air Conditioning (HVAC). All of the existing HVAC system would be removed and a new central water-cooled chiller plant with cooling towers would be provided to comply with LEED 2009 and EPAct 2005. The new central plant would be much more energy efficient than the existing systems, reduce maintenance and repairs, prolong equipment life, and allow future expansion and/or renovation. The chiller plant would be co-located with a new centralized power and communications hub. The existing centralized and inefficient hot water system would be replaced with a more energy efficient system. Existing utilities would be maintained for all the buildings that are used as swing space during the renovation process.

Telecommunications. Temporary outside plant infrastructure would maintain telecommunication service to portions of the Building 1 Complex which would remain in operation during the new construction/renovation work phase. The telecommunications would be stacked with the electrical room and telecommunications services would be replaced and centralized in order to facilitate

maintenance, repairs, security, and future service expansion/renovations. Existing utilities would be maintained for all the buildings that are used as swing space during the renovation process**.**

Fire Protection. The fire protection system for the proposed action would be designed in accordance with current DoD standards. Factors to be considered during the project's detailed design phase include floor area, type of building construction, and whether portions of the existing Building 1 Complex are considered one building or separate buildings. New and existing buildings would have sprinkler system coverage and be separated from each other by a building separation wall.

Access and Circulation. To facilitate vehicular/pedestrian access and movement within the Camp, the following recommendations are proposed: 1) a continuous access road around the perimeter of the new HQ/OPS Center; 2) a separate controlled entry and loading/delivery areas for MARFORPAC and the Joint Command; and 3) pedestrian walkways between the Physical Fitness Center and the new HP/OPS Center.

Open Space Buffers. As stipulated by the MOA, the open area created by the demolition of Buildings 3AA and 3B would serve as open space buffer between Building 3A and future development at Camp Smith. Similarly, the open area created by the demolition of Buildings 2AA and 2C would serve as an open space buffer between Building 2D and future development at the Camp.

Parking. As stipulated in the MOA, a parking structure could be sited on the north side of the new HQ/OPS Center and shall be no higher than the roofline of the HQ/OPS Center. The open area created by the demolition of Building 2C may be used as surface parking until such time as a parking structure is built after which the area would be reclaimed as an open space buffer.

2.1.2. Configuration 1 Alternative

Configuration 1 involves a greater amount of new construction, less renovation, and more demolition than Configurations 2 and 3 (See Figure 2-5). Configuration 1 does an exceptional job of addressing MARFORPAC's objectives for the new Building 1 Complex by consolidating and optimizing functional relationships, providing appropriate internal security design features, conforming to AT/FP requirements, minimizing construction impacts on existing operations, and incorporating efficient pedestrian and vehicular circulation. However, this alternative reuses the fewest number of existing buildings.

During the Section 106 consultation, it was determined that**,** although Configuration 1 best fulfills the Marine Corps' objective of a consolidated and secure headquarters, the alternative required the largest number of buildings to be demolished and would have had the greatest impact to the historic fabric of the Building 1 Complex of the three action alternatives. The characteristics of the Configuration 1 Alternative are described below, illustrated in Figure 2-6 and summarized in Table 2-2.

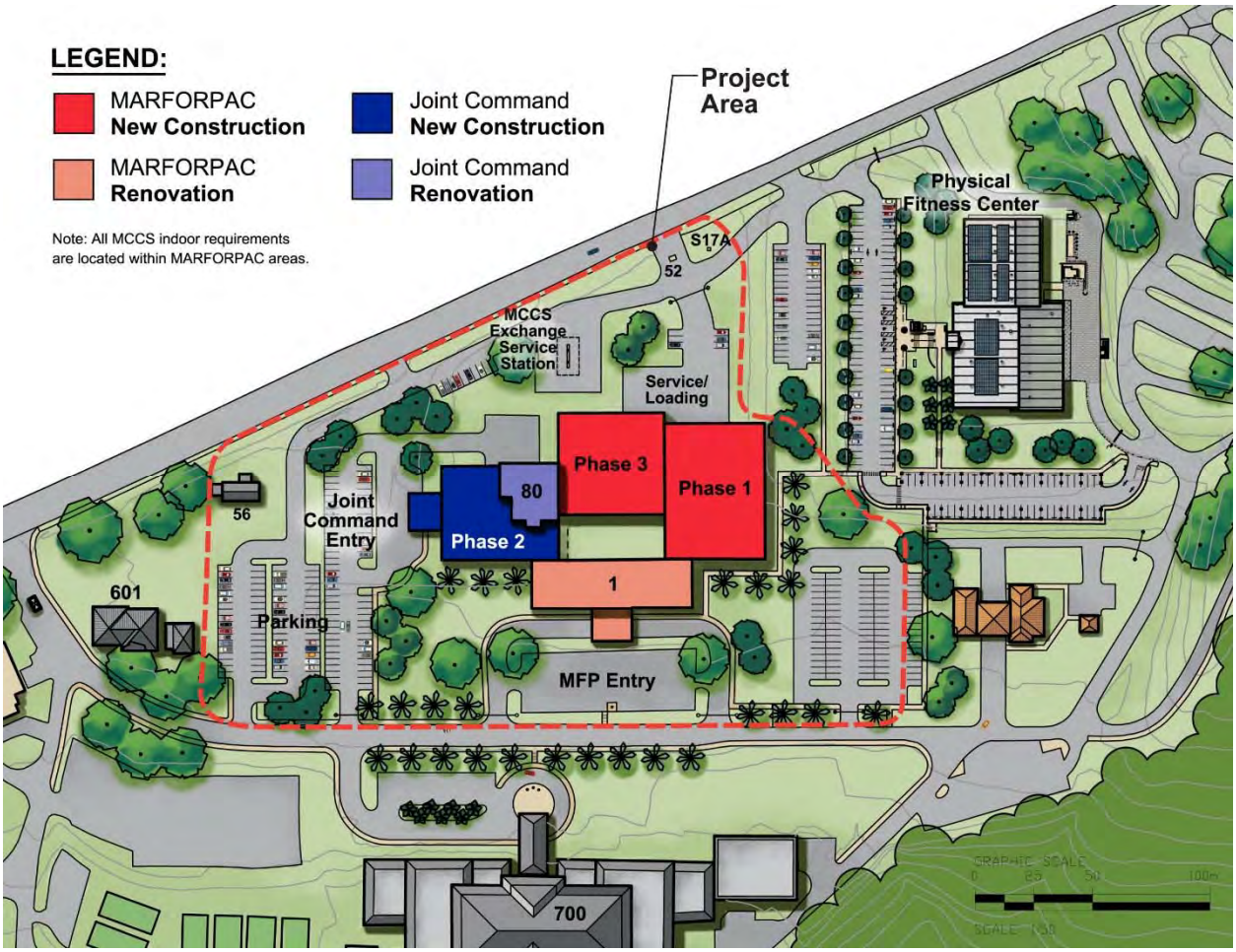

Figure 2-5: Conceptual site/phasing plan for Configuration 1

New Construction: There is significantly more new construction than renovation in the Configuration 1 Alternative, with 262,500 GSF of new space added. As in the proposed action, new construction would be located at the rear (on the north side) of the Building I Complex to retain views of the historic hospital administrative center, Building 1. The design of the new MARFORPAC HQ/OPS Center would be consistent with the design of the original hospital.

Renovation and Historic Preservation: Although the Configuration 1 Alternative provides more efficient operational space, it preserves fewer historic properties than the proposed action (Configuration 2). With Configuration 1, renovation would focus on Building 1, the original hospital administrative center, and Building 80, the Cold War-era command and control center. Together, this renovation would encompass 105,000 GSF.

Demolition: In Configuration 1 Alternative, the majority of the historic naval hospital and all wards would be demolished to make way for a new designed headquarters building. Portions of the Building 1 Complex demolished would include the four wards (Buildings 2D, 2C, 3A, and 3B), the spine or corridor (Buildings 1A, 2AA, 1B, 3AA), Buildings 4, 5, 5A, 81, and 82, and those auxiliary buildings that are not eligible for NRHP, Buildings 6 and 17. Approximately 275,000 GSF of 12 NRHP-eligible buildings would be demolished.

Phasing: Like the proposed action, new construction, renovation, and demolition for the Configuration 1 Alternative is expected to last 10 years. Three phases of new construction are planned and would precede renovation and demolition. The size of the new construction footprints would make it possible for entire commands to easily transition into their new spaces in one move, thus minimizing interruptions to operations. Demolition would follow renovation once swing space is no longer needed.

Proposed Improvements: The Configuration 1 Alternative would involve infrastructure upgrades that are similar to the proposed action.

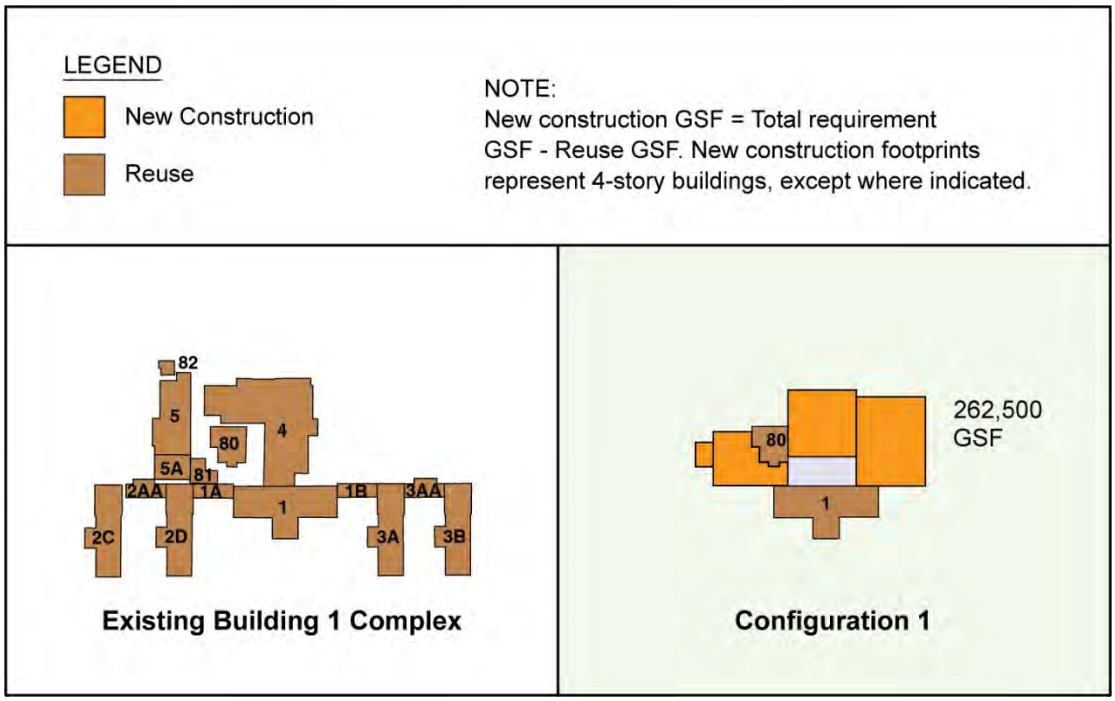

Figure 2-6: The Configuration 1 Alternative is characterized by a large amount of new construction resulting in a compact, efficiently configured headquarters building. This alternative preserves few historic buildings.

Table 2-2: Summary Characteristics of the Configuration 1 Alternative

Category	*Description*
Estimated Construction Period	10 years
New Construction	262,500 GSF
Renovation	105,000 GSF of 2 NRHP-eligible Buildings 1 and 80
Demolition	275,000 GSF of 12 NRHP-eligible buildings (from west to east, typical): 2C, 2AA, 2D, 5A, 5, 81, 1A, 4, 1B, 3A, 3AA, 3B; 3,000 GSF of 3 non-eligible buildings: 6, 17, 82
Footprint Reduction	15,000 GSF
Parking (Net Change)	20-stall decrease
Phasing	3 phases of new construction; renovation succeeds new construction; demolition succeeds renovation once swing space is no longer needed

2.1.3 Configuration 3 Alternative

Configuration 3 involves less new construction, more renovation, and less demolition than the proposed action (See Figure 2-7). Configuration 3 does an effective job of addressing MARFORPAC's objectives of consolidating and optimizing functional relationships and reusing existing buildings. This alternative would result in a secure, functionally efficient building but would provide less swing space and require more tenant moves during renovation than the Configuration 2 Alternative. The characteristics of the Configuration 3 Alternative are described below, illustrated in Figure 2-8, and summarized in Table 2-3.

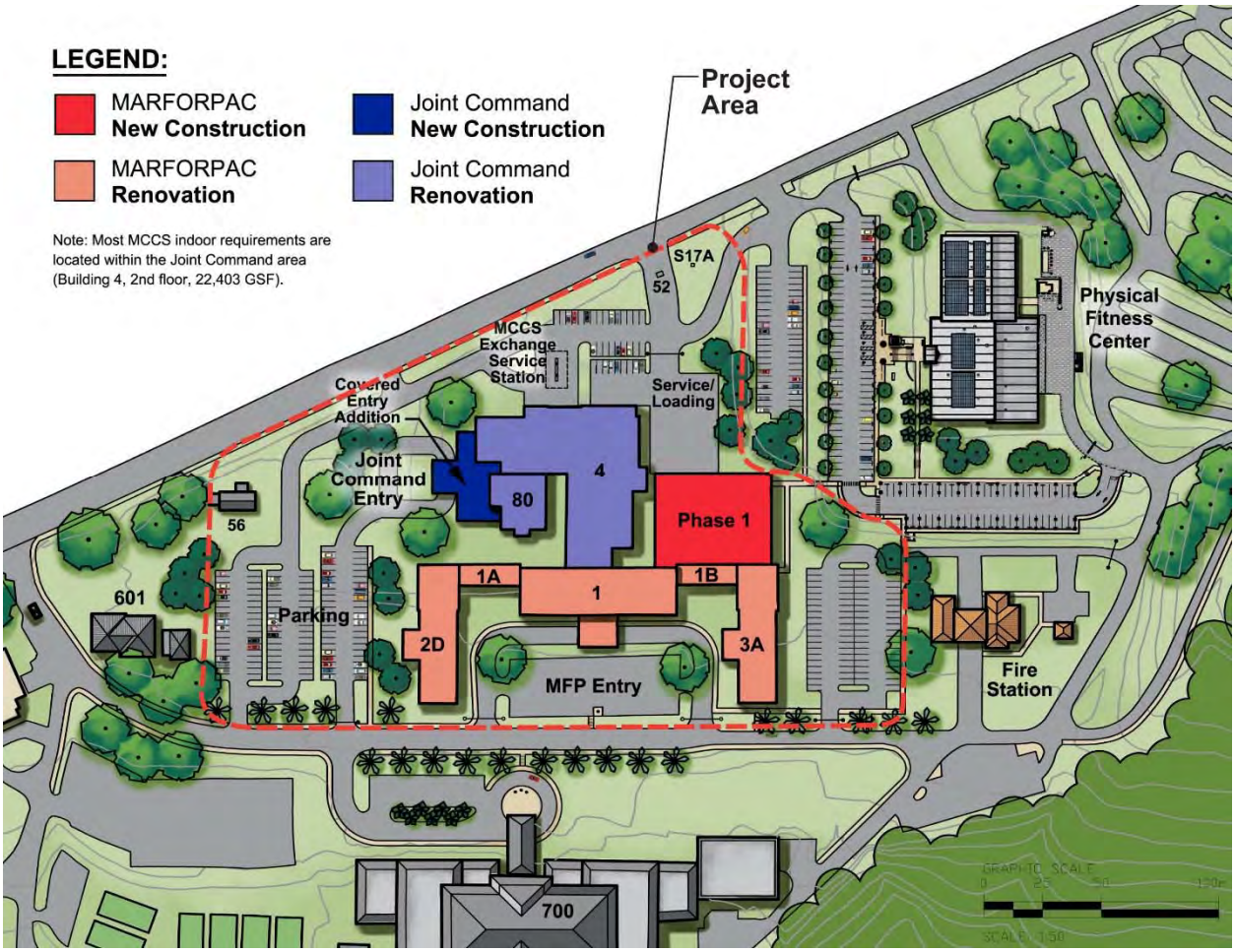

Figure 2-7: Conceptual site/phasing plan for Configuration 3

New Construction: In the Configuration 3 Alternative, there would only be one phase of new construction that would encompass 95,500 GSF. As in the proposed action, new construction would be located at the rear (on the north side) of the Building I Complex to retain views of the historic hospital administrative center, Building 1. A new entry would also be added to the west side of Buildings 4 and 80 for Joint Command use. The new HQ/OPS Center would be consistent with the design of the original hospital.

Renovation: The Configuration 3 Alternative has a higher retention of historic buildings than in the proposed action or the Configuration 1 Alternative. In addition to renovations of historic Buildings 1 and

80, Configuration 3 would also renovate the two original hospital wards (Buildings 2D and 3A), and their corridors (Buildings 1A and 1B).

Unlike the proposed action or the Configuration 1 Alternative, Configuration 3 retains and renovates Building 4. Renovation of Building 4 would include removal of the non-historic wooden portion of the second deck and the conference room on the third deck. Approximately 272,000 GSF of the Building 1 Complex would be renovated under Configuration 3.

Demolition: In the Configuration 3 Alternative, the outer wards (Buildings 2C and 3B) and their adjoining corridors (Buildings 2AA and 3AA) would be demolished. In addition, Buildings 5, 5A, 81, and 82, and those auxiliary buildings that are not eligible for NRHP listing (Buildings 6 and 17) would be demolished. Approximately 107,000 GSF of seven NRHP-eligible buildings would be demolished.

Phasing: New construction, renovation, and demolition for the Configuration 3 Alternative is expected to last five years. One phase of new construction is planned and would precede renovation and demolition. The limited new construction and robust renovation program would require multiple tenant moves. Demolition would follow renovation once swing space is no longer needed. Because Building 4 would be renovated and fewer new buildings would be built, the overall construction period for Configuration 3 would be shorter than Configurations 1 and 2.

Proposed Improvements: The Configuration 3 Alternative would involve infrastructure upgrades that are similar to the proposed action.

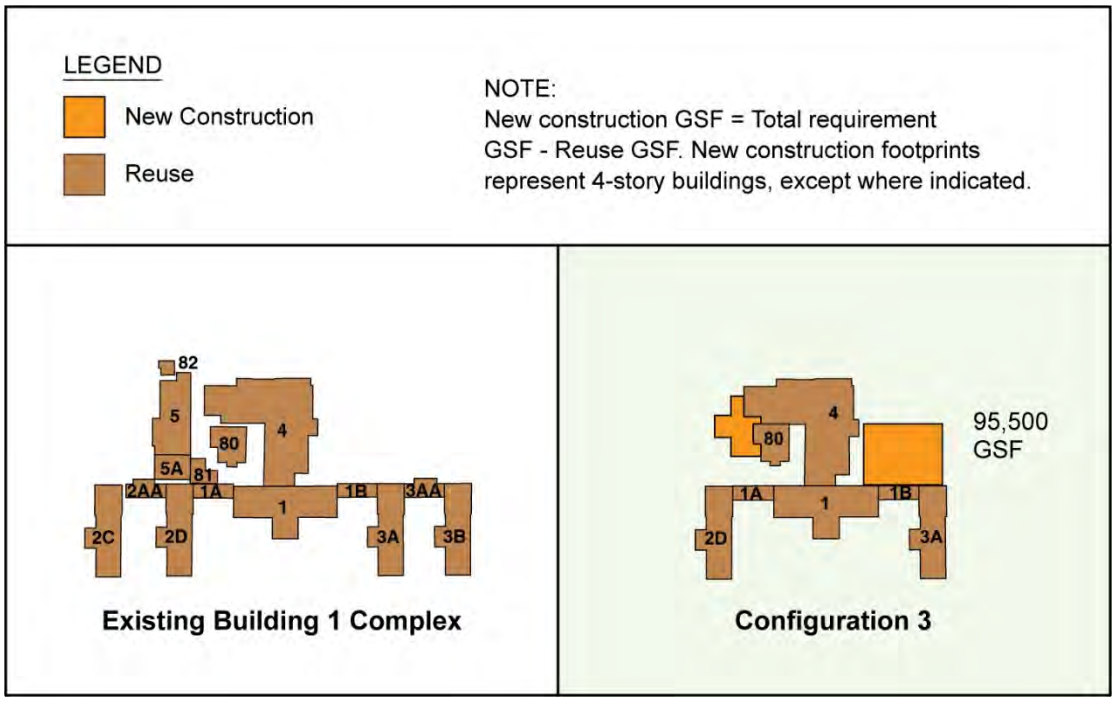

Figure 2-8: The Configuration 3 Alternative retains a high degree of historic building reuse although it is less compact and is not as efficiently configured as Configurations 1 and 2

Table 2-3: Summary Characteristics of the Configuration 3 Alternative

Category	*Description*
Estimated Construction Period	5 years
New Construction	95,500 GSF
Renovation	272,000 GSF, including 7 NRHP-eligible Buildings 2D, 1A, 80, 4, 1, 1B, and 3A
Demolition	107,000 GSF of 7 NRHP-eligible buildings (from west to east, typical), including 2C, 2AA, 5A, 5, 81, 3AA, 3B; 3,000 GSF of 3 non-eligible buildings: 6, 17, 82
Footprint Reduction	15,000 GSF
Parking (Net Change)	23-stall decrease
Phasing	1 phase of new construction; renovation succeeds new construction; demolition succeeds renovation once swing space is no longer needed

2.1.4 Comparison of Alternative Configurations

The characteristics of Configurations 1, 2, and 3 are summarized in Table 2-4.

Table 2-4: Comparative Summary of Characteristics for Configurations 1, 2, and 3

Description	*Configuration 1*	*Configuration 2*	*Configuration 3*
Estimated Construction Period	10 years	10 years	5 years
New Construction	262,500 GSF	185,500 GSF	95,500 GSF
Renovation	105,000 GSF of 2 NRHP-eligible buildings (1, 80)	182,000 GSF of 6 NRHP-eligible buildings (1, 1A, 1B, 2D, 3A, 80)	272,000 GSF of 7 NRHP-eligible buildings (1, 1A, 1B, 2D, 3A, 4, 80)
Demolition	275,000 GSF of 12 NRHP-eligible buildings (1A, 1B, 2AA, 2C, 2D, 3A, 3AA, 3B 4, 5, 5A, 81) and 3,000 GSF of 3 non-eligible buildings (6, 17, 82)	197,000 GSF of 8 NRHP-eligible buildings (2C, 2AA, 3AA, 3B, 4, 5, 5A, 81) and 3,000 GSF of 3 non-eligible buildings (6, 17, 82)	107,000 GSF of 7 NRHP-eligible buildings (2AA, 2C, 3AA, 3B, 5, 5A, 81) and 3,000 GSF of 3 non-eligible buildings (6, 17, 82)
Footprint Reduction	15,000 GSF	15,000 GSF	15,000 GSF
Parking (Net Change)	20-stall decrease	15-stall increase	23-stall decrease
Phasing	3 phases of new construction; renovation succeeds new construction; demolition succeeds renovation once swing space is no longer needed	3 phases of new construction; renovation follows new construction; demolition follows renovation once swing space is no longer needed	1 phase of new construction; renovation succeeds new construction; demolition succeeds renovation once swing space is no longer needed

2.1.5 No Action Alternative

Under the No-Action Alternative, there would be no renovation, new construction, or demolition as described under the proposed action, and the Building 1 Complex would not be modified. MARFORPAC and Joint Command would continue to operate in a physical space that is unconsolidated and

inefficiently configured**,** with aging and problematic utility systems. The Commands would continue to be challenged with security issues and building deficiencies. The No-Action Alternative does not support the purpose and need for the action and is not considered a feasible alternative. It is carried through the analysis to satisfy CEQ requirements and to provide a benchmark to compare the magnitude of environmental effects of the action alternatives.

2.2 Alternatives Considered but Dismissed

Three other alternatives were considered thoroughly, but dismissed from formal consideration as feasible alternatives to the action alternatives.

2.2.1 Configuration 4 Alternative

Configuration 4 was one of the alternatives considered by MCB Hawaii. This configuration would comprise 106,500 GSF of new construction, 261,000 GSF of renovation and 119,500 GSF of demolition of the existing Building 1 Complex. Of all the alternatives studied, Configuration 4 includes the least amount of new construction and preserves the most historic fabric of the Building 1 Complex. New construction would occur on the north side of Buildings 1, 1B and 1A. All the character-defining hospital wings and corridors would be preserved (1, 1A, 2D, 2AA, 2C, 1B, 3A, 3AA, and 3B). The less visible portions of the old hospital, Buildings 5A, 5, 82, 81 and 4, would be demolished to make way for new construction of a command operations center (COC) for MARFORPAC and the Joint Command. This alternative would be built over a 10-year period and involve three phases of new construction followed by six phases of renovation. Demolition would follow renovation once swing space is no longer needed.

In addition to maintaining inefficient functional relationships, this alternative would not support MARFORPAC's mission and would greatly impact MARFORPAC's operations during construction. The Configuration 4 Alternative was dismissed as a reasonable alternative because, although it retains the most historic buildings**,** it does not fulfill the needs of MARFORPAC, which are to facilitate operational efficiency and effectiveness through maximizing tenant functional relationships in its space. A key problem is that the facility was originally designed for hospital and convalescent care that provided high window-to-wall ratios, long aspect floor plans, natural daylight and ventilation, and a layout which facilitated patient care routines, etc.). The original design is not compatible with modern operations and communications facilities that require large, auditorium-like spaces, with no exterior windows, secure perimeters, and controlled entry points. Furthermore, this alternative would have a high negative impact on operations due to the limited available swing space, the multiple moves required during construction, and the numerous renovation phases. Ultimately, this alternative does not fulfill the purpose and need for the proposed action.

2.2.2 Bordelon Field Alternative

An early alternative considered by MCB Hawaii was to construct a new operations center on Bordelon Field at Camp Smith to replace the Building 1 Complex. Bordelon Field is located approximately 1,200 feet (ft.) to the west and downhill of the Building 1 Complex (See Figure 2-2). Built in 1956 by cutting into the hillside and leveling the slope, the 10-acre field is currently used for recreation, parade activities, and field exercises.

The space requirement for a combined MARFORPAC and Joint Command building is approximately 380,000 GSF. With these space requirements, the new building at the Bordelon Field site would be five to six floors with an average 69,000 GSF per floor. The Bordelon Field Alternative would consist of a south-facing structure with a central courtyard and in general alignment with the existing Building 700

(USPACOM) and Building 1 Complex axes. There would still be enough space on Bordelon Field to accommodate some recreational use adjacent to the new building. Other site improvements could include a 440-stall surface parking area. The projected cost for this alternative was estimated to be $288 million.

The advantages of the Bordelon Field alternative are that the building would facilitate preferred tenant functional relationships and fulfill building and tenant security requirements. In addition, because the project consists entirely of new construction, only one tenant relocation phase would be required**,** with minimal disruption of Camp Smith operations. This alternative would preempt the use of Bordelon Field for various activities and its distance from USPACOM (Building 700) would preclude convenient pedestrian access between MARFORPAC and USPACOM since Building 700 is about 1,300 ft. east of Bordelon Field. A major disadvantage of this alternative is that it leaves the historic Building 1 Complex vacant. Ultimately, this alternative was dismissed from further analysis because it did not facilitate functional and spatial relationships between MARFORPAC and USPACOM and did not address the continued use or preservation of the historic properties of the Building 1 Complex.

2.2.3 BEQ Site

The Bachelor Enlisted Quarters (BEQ) Site Alternative is located across Bailey Road from Bordelon Field, approximately 600 ft. south of the Building 1 Complex (See Figure 2-2). The site is steep (11% average slope), relatively small (2.1 acres), and contains four 3-story buildings (Buildings 401-404) built on a terraced slope surrounded by roads and parking. The BEQ site was proposed during the Section 106 consultation process as a potential alternative site for the new MARFORPAC/Joint Command building. The projected cost for this alternative was estimated to be $270 million.

A conservative interpretation of the AT/FP standoffs would significantly limit the construction potential of this site. Depending on security limitations, a basic building requirement of 354,535 GSF would entail between a 5- to 14-floor building mass, stepped down the hillside in several staggered blocks. The number of floors would need to increase to accommodate landscaping, ground-plane features, courtyards, and articulation.

This alternative was dismissed from further analysis because the required density would be too high and inappropriate for the Camp Smith area. The small size, the steep slope and other site conditions limit the construction potential of the site for a building of the scope needed for MARFORPAC/Joint Command. Also, like the Bordelon Field Alternative, the BEQ Site Alternative leaves the historic Building 1 Complex vacant.

2.3 Summary of the Environmental Effects of the Proposed Action and Alternatives

Table 2-5 summarizes the environmental consequences of the action alternatives (including the proposed action) and the No-Action Alternative as discussed in Chapter 3, Affected Environment and Environmental Consequences.

Table 2-5: Summary of Environmental Consequences of the Proposed Action and Alternatives

Resource/Issue of Concern	*Proposed Action (Configuration 2)*	*Configuration 1 Alternative*	*Configuration 3 Alternative*	*No-Action Alternative*
Air quality and noise	Short-term air quality and noise impacts during construction that will be avoided or minimized by incorporating best management practices.	Similar to the proposed action.	Similar to the proposed action.	Long-term beneficial effects from improved operations, functional efficiency, and enhanced security would not be realized.
Water quality and biological resources	No impacts to biological resources; no protected species or critical habitat located in the project area. Best Management Practices (BMPs) and compliance with regulatory requirements would apply to all construction work.	Similar to the proposed action.	Similar to the proposed action.	No impact.
Cultural resources	Adverse effect to historic properties in the larger Building 1 Complex due to the demolition of eight NRHP-eligible buildings (2AA, 2C, 3AA, 3B, 5, 5A, 81, and 4*) which would be mitigated by measures stipulated in the NHPA Section 106 MOA. *NRHP-eligible buildings listed in order of historic preservation priorities as shown in Figure 3-5. Impact to the historic viewshed from Elrod Rd. due to demolition of NRHP-eligible Buildings 2C, 2AA, 3AA, and 3B.	Greatest impact to NRHP-eligible buildings; four more buildings to be demolished than proposed action including the historic ward wings extending out to Elrod Road (2D and 3A). Greater impact than proposed action due to demolition the 2D and 3A wings.	Similar to the proposed action except for reuse of NRHP-eligible Building 4. Similar to the proposed action.	No impact.
Infrastructure	No adverse impact upon potable water, sewer, drainage, electrical power, HVAC, or tele-communication systems. Energy-efficient equipment and design features would result in more efficient infrastructure operations.	Similar to the proposed action.	Similar to the proposed action.	No impact.

Resource/Issue of Concern	*Proposed Action (Configuration 2)*	*Configuration 1 Alternative*	*Configuration 3 Alternative*	*No-Action Alternative*
Traffic/Parking	Minor disruptions to local traffic and availability of onsite parking during project construction. To minimize these impacts, a Traffic Management Plan would be implemented to control material deliveries and work schedules. Section 106 MOA includes stipulations for a parking study and construction of a parking structure to the rear (north) of new HQ/OPS Center. MOA also allows an open area created by demolition of Building 2C to be used for surface parking until the parking structure is built.	Similar to the proposed action. Small difference in the number of parking stalls provided.	Similar to the proposed action. Small difference in the number of parking stalls provided.	No impact.
Socio-economic environment	Beneficial effects to local economy during construction.	Similar to the proposed action.	Similar to the proposed action.	No impact.
Operational Efficiency	Configuration 2 provides new purpose built, functionally efficient spaces that will address MARFORPAC tenant commands needs. The configuration provides internal security design features and incorporates efficient pedestrian and vehicular circulation. This configuration effectively consolidates and optimizes functional relationships, conforms to AT/FP requirements, and minimizes construction impacts on existing operations and adequately addresses the reuse of existing buildings.	This configuration provides the highest percentage of new floor area and therefore provides the highest level of functional efficiency and internal security design features. Similar to the proposed action, this configuration complies with AT/FP requirements, minimizes construction impacts on existing operations, and incorporates efficient pedestrian and vehicular circulation.	Similar to the proposed action except that the Building 4 reuse would not be as operationally efficient as the new, purpose-built space provided by Configuration 2.	No impact.

Chapter 3 Existing Environment and Environmental Consequences

This chapter describes the existing environmental setting and establishes baseline conditions for the environmental resources and issues of concern which could potentially be affected by the action alternatives (Configurations 1, 2, and 3). This chapter also evaluates environmental consequences of the action alternatives including direct, indirect, short-term, long-term, and cumulative impacts on relevant environmental resources. (See Table 2-5 for an overview of the environmental effects analyzed below.)

3.1 Affected Environment

The project area for each of the action alternatives is the same; the only variation among the three alternatives is the varying degree of new construction, renovation, and demolition that are proposed. The redevelopment project area would be limited to the existing 10.5-acre Building 1 Complex located within the Camp Smith fence line. Since the project area for all of the action alternatives is the same, the discussion of the affected environment and potential impacts is presented on a collective basis, with any exceptions noted.

3.1.1 Overview

The construction of the new HQ/OPS Center would be undertaken in phases to maintain continuous operational capability. New construction would occur first and would be followed by renovation and then demolition once swing space is no longer needed. Preliminarily, the estimated construction period for two of the action alternatives (Configurations 1 and 2) is 10 years and includes three phases of new construction. Configuration 3 has an estimated construction period of five years and includes one phase for the construction of new facilities.

Comprehensive construction documents (*e.g.,* plans, reports, drawings, calculations, and specifications) would be prepared during the project's detailed design stage to guide, coordinate, and implement all construction work, scheduling, and phasing for the new HQ/OPS Center. Specific measures to minimize construction impacts and maintain around-the-clock operational functions (*e.g.,* COC) would also be formulated during the project's detailed design phase. The construction documents would comply with all applicable regulatory requirements and would be submitted to appropriate federal and state agencies as part of the regulatory review process for construction-related permits and development approvals.

3.1.2 Scope of the Resource Analysis

The action alternatives would involve the redevelopment of the existing Building 1 Complex to provide a new MARFORPAC HQ/OPS Center which would be located on the same site, serve the same function, and have a smaller footprint than the existing Building 1 Complex. Accordingly, potential differential impacts on environmental resources between the action alternatives, other than to cultural resources, are not discernable for purposes this NEPA analysis. The discussion of resources and issues is organized by resource/issue (*e.g.,* air quality, noise) and begins with an overview of existing conditions related to that topic. These resources were grouped into one of three categories based on their potential for environmental impact: 1) those that have no impact and are not subject to further assessment; 2) those with the potential to be impacted or cause an impact, thereby warranting discussion; and 3) those subject to potentially considerable impact or of causing such an impact, thus warranting detailed analysis.

In accordance with CEQ guidance 40 CFR 1501.7a(3), only resources/issues that have the potential to be affected or to cause an impact are discussed in this EA. Because the new MARFORPAC HQ/OPS Center is a redevelopment project (*i.e.,* replacement of an existing facility and use with a more efficient facility with the same use), explanations of why the action alternatives would have little or no impact upon the following resources/issues are provided below.

- *Topography and Soils*. Because the developed portions of Camp Smith have been extensively disturbed by past ground-altering activities, the redevelopment project would have little or no effect on the existing topography or soils.
- *Flood Hazards*. There are no streams or water bodies in or near the project area that could foreseeably increase the flood hazard potential in the area. Although Camp Smith lies in the Flood Insurance Rate Map Zone D (flood hazards not yet determined), the Camp is located on an upland, ridgeline site with no previous instances of major flooding. Due to its location, the redevelopment project would not create conditions which would trigger or increase the potential for flooding in the area.
- *Scenic and Visual Resources*. The Halawa Heights area, including Camp Smith, is not identified as a major panoramic or protected view by the City and County of Honolulu (CCH; local jurisdiction). Existing public views of the project area would not be adversely affected because the redevelopment project would be built on the same or smaller footprint than the existing Building 1 Complex.
- *Land Use Compatibility*. The USMC has been headquartered at Camp Smith since 1955. The proposed action involves the modernization and continuation of a long-established land use that is consistent with State and CCH laws and has co-existed with the surrounding land uses for the past 60 years. The redevelopment project is compatible with existing land uses in the area.

Resources/issues that could potentially be affected by the action alternatives include: air quality, noise, biological resources, water resources, cultural resources, infrastructure and socioeconomic conditions. The potential impacts associated with these resources/issues are discussed in this chapter.

The redevelopment project would have a significant impact on cultural resources since the action alternatives would involve the demolition of up to 12 buildings that are eligible for listing on the NRHP. The effect this action would have on cultural resources, as well as measures to mitigate the effects to the larger Building 1 Complex are detailed in this chapter.

The development of the new MARFORPAC HQ/OPS Center is not expected to result in any significant direct, indirect or secondary impacts that cannot be mitigated. An analysis of cumulative impacts was conducted on a qualitative basis that determined that the proposed action would not result in any long-term impacts that could not be avoided, minimized or mitigated.

3.1.3 Project Area

Camp H.M. Smith is part of MCB Hawaii and is located at the 600 ft. elevation on a ridgeline overlooking Pearl Harbor and Oahu's south shore. The facility occupies about 220 acres of land on the upper slopes of Halawa Heights and lies about six miles northwest of downtown Honolulu. Major facilities at Camp Smith include operational and administrative buildings, troop housing, and personnel support facilities (See Figure 3-1.)

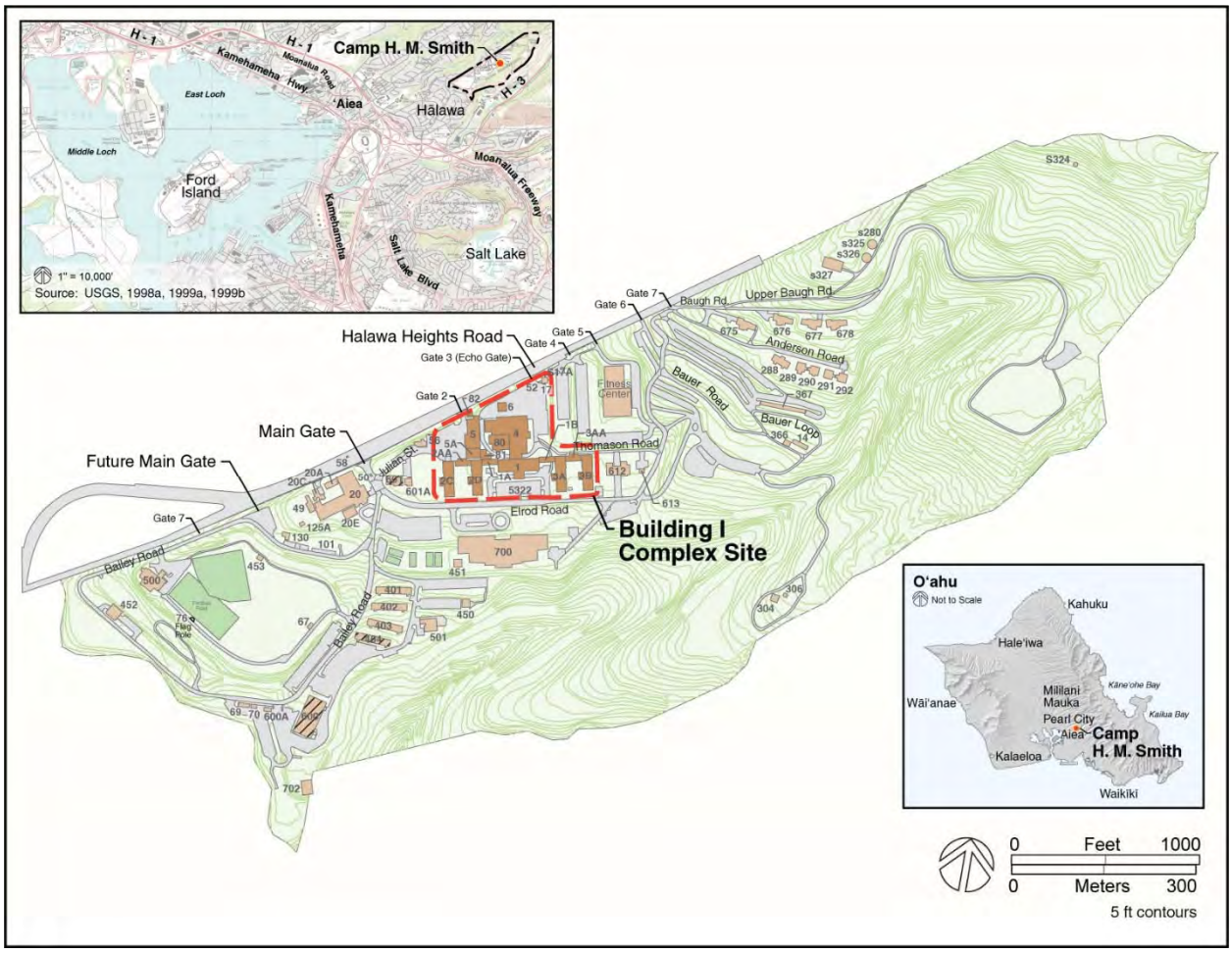

Figure 3-1: Location map for Camp H.M. Smith

A deep gulch runs through the Camp; the developed portion of the installation, including the Building 1 Complex, lies along the western ridge nearest Halawa Heights Road. A significant portion of Camp Smith is forested and unoccupied, largely due to steep topography. Vehicular access to Camp Smith is provided by Halawa Heights Road, a two-lane road owned by the CCH, which runs along the northern boundary of the installation. The existing Building 1 Complex is accessed via Elrod Road and is located across Elrod Road from USPACOM's Pacific Command Center. The area around the Building 1 Complex is the largest and one of the few relatively flat areas at Camp Smith. Land use adjacent to Camp Smith is characterized by residential housing to the northwest and southwest of the Camp and a steep hillside down into Halawa Valley on the north and east sides. Land use to the south of Camp Smith, in Halawa Valley, includes the H-3 Freeway, a Hawaiian Cement quarry, the Halawa Correctional Facility, the state's animal quarantine facilities, and water tunnels owned by the Navy and the CCH. The nearest community to Camp Smith is Aiea, which had a population of 9,338 in 2010 (U.S. Census, 2010).

3.2 Air Quality

3.2.1 Affected Environment

The Clean Air Act (Amended 1990) is the federal law that regulates air emissions from stationary and mobile sources. This law authorized the U.S. EPA to establish National Ambient Air Quality Standards (NAAQS) to protect public health and regulate emissions of hazardous air pollutants. Although the Clean

Air Act is a federal law, the EPA has allowed the states to assume responsibility to regulate and ensure compliance with the Clean Air Act in exchange for federal funding. The Hawaii Department of Health (DOH), is responsible for monitoring air quality throughout the state in accordance with the Act. Chapter 11-60.1 (*Air Pollution Control*) and Section 11-60-33 (*Fugitive Dust*) of the Hawaii Administrative Rules for the DOH establish standards that govern air quality and pollution in Hawaii.

Air quality in the state can generally be characterized as relatively good and low in pollution. As indicated in the 2013 Summary of Air Quality Data for Hawaii, criteria pollutant levels remain below state and federal ambient air quality standards at all state and local air monitoring stations throughout Hawaii excluding exceedances of pollutants due to the continuing volcanic eruption on the island of Hawaii. As such, the state was in attainment of all national ambient air quality standards in 2013, and is not subject to the Clean Air Act's General Conformity Rule (DOH, 2014). There are no identified stationary sources of air pollution at Camp Smith that would result in non-compliance with the standards. Daily impacts to air quality are primarily attributed to motor vehicle traffic, and these emissions are easily dispersed. The tradewinds that are predominant throughout the year typically carry emissions and other air pollutants from inland areas out toward the ocean.

3.2.2 Potential Impacts

3.2.2.1 Action Alternatives

Earth-moving activities associated with grubbing, grading, and stockpiling have the potential to generate fugitive dust emissions. While the action alternatives would differ in the amount of new construction, renovation, and demolition, appropriate dust control measures that comply with state air quality regulations would be implemented during construction to minimize fugitive dust. Examples of such BMPs include a watering program or using wind screens and jobsite construction management practices such as road cleaning, tire washing, or placing crushed rock on bare areas used for access or operational areas. Exhaust emissions from construction vehicles and equipment can be minimized by proper operation and maintenance procedures. The new Uninterrupted Power Supply (UPS) system for the new HQ/OPS Center would utilize EPA-compliant generators to provide emergency backup power and auxiliary power during peak load periods as warranted, and would comply with Chapter 11-60, HAR. No adverse, long-term air quality impacts to the surrounding area are anticipated nor would federal or state ambient air quality standards be exceeded.

3.2.2.2 No-Action Alternative

Under the No-Action Alternative, the action alternatives would not occur and there would be no change to baseline air quality. Therefore, no significant impacts to air quality or air resources would occur with implementation of the No- Action Alternative.

3.3 Noise

3.3.1 Affected Environment

Ambient noise levels in the project area are relatively low, and predominantly a function of the amount of traffic on adjacent roads. Noise-sensitive receptors in the area include nearby homes within Camp Smith and residential areas along Halawa Heights Road that are proximate to the site.

The Noise Control Act (42 USC § 4901 et seq.) was enacted in 1972 to protect public health and regulate noise pollution. In 1982, the EPA transferred the responsibility for regulating noise to state and local governments. In accordance with the Noise Control Act, the Hawaii State Department of Health (DOH)

established noise quality standards that protect public health and prevent major degradation of the environment and quality of life. These standards are set forth in Chapter 11-46, HAR (*Community Noise Control).* Section 11-46-3, HAR identifies three zoning districts for noise classification purposes. Camp Smith falls within the Class A zoning district which includes all areas equivalent to land zoned residential, conservation, preservation, public space, open space, or of similar type. The unit of measurement for describing the total sound level of all noise is the A-weighted sound level (dBA). The maximum permissible sound level in a Class A district is 55 dBA from 7 am to 10 pm and 45 dBA from 10 pm to 7 am. The sound level measurement is typically taken at the property line of the noise sensitive receptor (*i.e.,* the residential-zoned property across the street (Halawa Heights Road) from the Building 1 Complex). Camp Smith has received occasional complaints in the past from residents along nearby Halawa Heights Road about noise from the Camp's air conditioning (AC) and power backup systems (UPS) when they are running.

3.3.2 Potential Impacts

3.3.2.1 Action Alternatives

Construction noise could temporarily affect the occupants of noise-sensitive receptors in the vicinity of the project site (*e.g.,* homes within Camp Smith and along Halawa Heights Road). Noise from compactors, tractor-trailers, front-end loaders, backhoes, excavators, bulldozers, dump trucks, graders, generators, jackhammers, and power tools would be the dominant source of construction noise. Measures to minimize noise include the use of sound-dampening devices (*e.g.,* baffles, mufflers) and properly maintaining all equipment, vehicles, and machinery. The building contractor would be responsible for compliance with DOH standards for noise control. To minimize noise impacts construction would be limited to normal daylight hours. Should construction noise exceed the 55 dBA daytime sound limit, the contractor would obtain a Community Noise Permit from the DOH. The modern AC and UPS systems for the new HQ/OPS Center would incorporate up-to-date sound attenuation features which would minimize noise during operations. The action alternatives would not result in any adverse noise impacts to the surrounding area during the project's long term, operational (*i.e.*, post construction) period nor would they cause national or local noise standards to be exceeded.

3.3.2.2 No-Action Alternative

Under the No-Action Alternative, the action alternatives would not occur and there would be no change to baseline noise levels. Therefore, no significant impacts due to noise would occur with implementation of the No-Action Alternative.

3.4 Biological Resources

3.4.1 Affected Environment

3.4.1.1 Flora

The 10.5-acre project site is fully developed with several small landscaped yard areas and some mature trees. Botanical resources at Camp Smith are largely characterized by non-native plants including those that are typically found in urban landscaped settings. The area around the developed western ridge contains many trees commonly used in landscaping, such as large banyan (*Ficus microcarpa*), Monkeypod (*Samanea saman*), and Brassia (umbrella) trees (*Schefflera actinophylla*). Natural vegetation consists of an open guava forest with shrubs and plants. Undeveloped areas of Camp Smith support groves of ironwood (*Casuarina equisetifolia*) and swamp mahagony (*Eucalyptus robusta*). There are no threatened, endangered, or candidate species of plant life in the project area that are eligible for listing by the U.S. Fish and Wildlife Service or the Hawaii Department of Land and Natural Resources.

The National Wetlands Inventory indicates that there are no wetlands at Camp Smith or in the surrounding area. The closest wetland lies 1-mile southwest of the installation around Aloha Stadium (U.S. Fish and Wildlife Service, 2015).

3.4.1.2 Fauna

Most of the animal life at Camp Smith consists of non-native species. Rock doves (*Columba livia*), other doves (*e.g., Geopelia striata* and *Streptopelia chinensis*) and feral pigs (*Sus scrofa*) are problematic species at Camp Smith. Remnants of a native bird community exist at the higher-elevation forest area above Camp Smith, and include amakihi (*Hemignathus chloris*) and apapane (*Himiatione sanguinea*). These species may descend to Camp Smith along with the seasonal, indigenous migratory golden plover or kolea (*Pluvialis fulva*). Dominant wildlife are all introduced species and include mice (Mus domesticus), feral cats (Felis catus), feral dogs (*Canis familiaris*), rats (*Rattus spp.*), mongoose (*Herpestes auropunctatus auropunctatus*) and feral pigs. The Hawaiian short-eared owl or pueo (*Asio flammeus sandwichensis*) is on the state's endangered list and has been observed in the upper forested areas above Camp Smith. There are no other known threatened, endangered, or candidate species of animal life in the project area that are eligible for federal or state listing.

3.4.2 Potential Impacts

3.4.2.1 Action Alternatives

As noted, the 10.5-acre project site is fully developed with several small landscaped yard areas and some mature trees. There are no federal or state-listed threatened, endangered, or candidate species of plant and animal life in the project area nor are there any unique habitats that are critical for their support. As such, the action alternatives would not have an adverse impact on important biological resources or critical habitat during construction or long-term building operation. All project-related construction work would be limited to the area around the existing Building 1 Complex and would not impact flora or fauna in the area. BMPs would be employed to shield any construction-period and operational period lighting to minimize impacts to any light-sensitive species.

3.4.2.2 No-Action Alternative

Under the No-Action Alternative, the action alternatives would not occur and there would be no change to biological resources. Therefore, no significant impacts to biological resources would occur with implementation of the No-Action Alternative.

3.5 Water Resources

3.5.1 Affected Environment

There are no surface waters in the vicinity of the project area (the nearest surface water is North Halawa Stream, approximately 2,000 feet to the east of the project area). Camp Smith lies within the lower reaches of the 9.8 square mile Halawa Watershed in which Halawa Stream flows. The watershed drains the southeastern-most valleys in Central Oahu and is one of eight other watersheds that drain into Pearl Harbor. The most significant ground water body providing Oahu's potable water (including Camp Smith) is the Pearl Harbor Aquifer, defined as a regional, unconfined, basal groundwater aquifer composed of Koolau basalt (CCH, 2004). Most of the land area above the Pearl Harbor Aquifer is developed as either residential or other urban uses. Threats to the aquifer are typically from over-pumping, and pollution from stormwater runoff, wastewater systems and agricultural and urban pesticides and herbicides. Withdrawals from the aquifer are regulated by the State of Hawaii to ensure they are within sustainable levels.

3.5.2 Potential Impacts

3.5.2.1 Action Alternatives

None of the action alternatives involves work that would impact surface waters or basal aquifers. BMPs including drainage and erosion-control measures would be implemented during construction to manage surface runoff and pollutants. The Camp Smith wastewater collection system (which the proposed action would tie into) would continue to be connected to the Navy's wastewater treatment plant at Fort Kamehameha. The EPA and U.S. Green Building Council (USGBC) have identified various stormwater management best practices that would need to be considered during the project's detailed design phase. These measures include, but are not limited to: bio-retention cells; curb and gutter elimination; grassed swales; green parking design; infiltration trenches; inlet protection devices; permeable pavement; permeable pavers; rain barrels and cisterns; riparian buffers; sand and organic filters; soil amendments; tree box filters; vegetated filter strips; and vegetated roofs. The building contractor would be responsible for compliance with applicable Federal, State, and local regulations including the Clean Water Act (Section 402 NPDES Permit), Chapter 11-54, HAR (*Water Quality Standards*), and Chapter 11-55 (*Water Pollution Control*). Sustainable sites credits associated with green building best practices focus on various techniques and procedures to avoid and then minimize construction-related pollution. The action alternatives are not expected to generate or result in any adverse long-term impacts to ground or surface water resources nor would they increase the potential for resource infiltration due to runoff or pollutants. Storm-water management systems associated with green building best practices (*e.g.,* buried catchment basins) are designed to manage any increase in runoff volume and reduce the potential for total suspended solids and other pollutants from leaving the site.

3.5.2.2 No-Action Alternative

Under the No-Action Alternative, the action alternatives would not occur and there would be no change to baseline water resources. Therefore, no significant impacts to water resources would occur with implementation of the No-Action Alternative.

3.6 Cultural Resources

3.6.1 Affected Environment

3.6.1.1 Previous Archaeology in the Area

An internal Cultural Resources Management Plan for MCB Hawaii provides a detailed summary of the history and archeological and architectural studies conducted for Camp Smith. Based upon previous archaeological surveys conducted at Camp H.M. Smith, there are no archaeological resources of any significance on the installation, and there is no probability for the occurrence of any previously unidentified archaeological resources. The entire installation has been evaluated as an area with low archaeological sensitivity. The SHPO reviewed and concurred with the study's findings and recommendations.

3.6.1.2 Modern History of Camp Smith

The Camp is named in honor of the late General Holland McTyeire "Howlin' Mad" Smith, the first commanding general of Fleet Marine Force, Pacific (FMFPAC), a precursor to MARFORPAC.

The site was previously used for sugar cane cultivation and grazing until Congress approved the purchase of the property in March 1941. The land was acquired for a naval hospital with construction commencing in July 1941. Known as the Aiea Heights Naval Hospital (AHNH), the multi-wing, multi-story

structure was designed by C.W. Dickey and was his last project before he died in April 1942. The Bureau of Yards and Docks supervised the construction of the hospital. The 1,650-bed facility was rushed to completion after the Japanese attacked Pearl Harbor in December 1941. The hospital was commissioned in November 1942 and although completed, the hospital had to expand its facilities to meet war-time needs. During WWII, the hospital served as the primary naval medical facility on Oahu and the primary rear-area hospital for the Navy and Marine Corps in the Pacific. By 1944, it was the largest military hospital processing casualties from the Pacific theater of war and the first notable industrial occupational therapy military hospital outside the continental United States. See Figure 3-2. The hospital, also referred to as Purple Heart Junction (Tomonari-Tuggle et al. 2014:111-17), reached its peak load when 5,676 patients were receiving medical care at one time following the Battle for Iwo Jima in the spring of 1945.

During WWII, AHNH provided medical care and rehabilitation for servicemen who were wounded in the Pacific theater as they made their way back home through Hawaii (Tuggle et al. 1998). To support a patient's physical and mental recovery, the hospital implemented occupational therapy and recreational programs. The hospital's Industrial Occupational Therapy Program, one of the first in the Navy hospital system, allowed patients to participate in farming, carpentry, mechanics, clerical work, arts and crafts, laundry, or other similar activities. Recreational programs and activities such as bowling, baseball, tennis, boxing, archery, volleyball, softball, and swimming were open to the hospital staff and patients. The hospital also provided entertainment for its staff and patients. Celebrities and entertainers frequented the hospital, visiting with injured servicemen or performing for their benefit. The hospital grounds also included Camp McMullin (now called Camp Hawkins), a picnic and recreational area with views of Diamond Head and the ocean, and Shangri-La, a small rustic pavilion at its center located approximately ¼ mile to the southeast of the Building 1 complex (See Figure 1-2). Because the camp was not visible from the hospital complex, it provided therapeutic refuge and felt like being at a far-away retreat. During the war, AHNH became known for its progressive therapies and compassionate treatment of convalescing servicemen.

Many changes have occurred at the AHNH campus since 1946. The most significant changes appear to include the on-going removal of many temporary buildings throughout the installation, including some wings of the Building 1 Complex; the creation of Bordelon Field with extensive grading in the 1960s; and the recent addition of Building 700 (USPACOM). Within the overall campus, a few scattered historic landscape features and areas appear to have seen less modification, including Camp Hawkins, Building 20 and the adjacent pool area; the surviving courtyards at the Building 1 Complex; and the western end of the tennis court terrace area. The swimming pool area and tennis courts retain their historically-defining view toward Pearl Harbor, while Camp Hawkins and Shangri-La retain their view toward downtown Honolulu and Diamond Head although they are partially screened by encroaching forested growth.

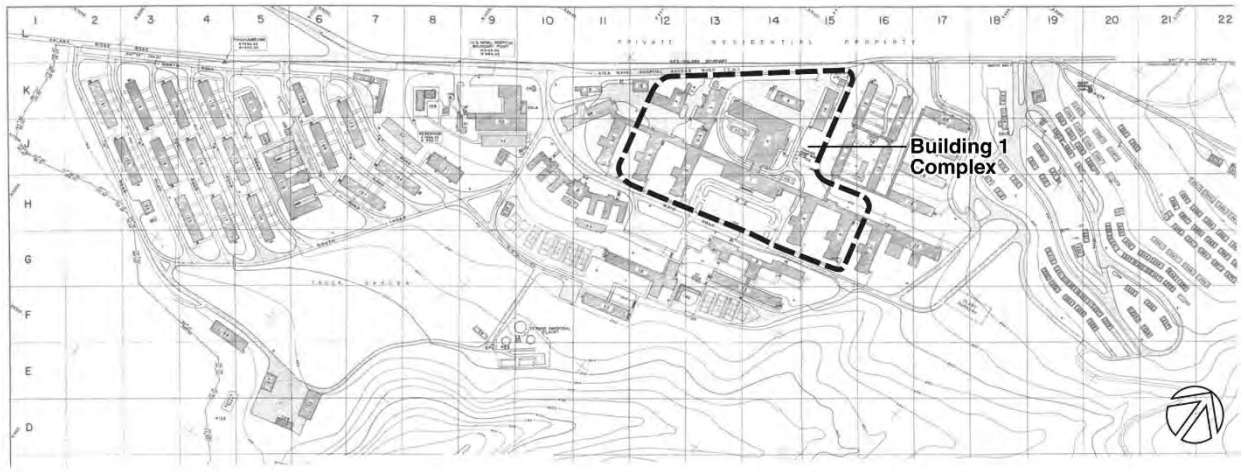

Figure 3-2: 1946 map of the extent of the Aiea Heights Naval Hospital. Main complex (center), Quonset huts used as temporary wards (east), and other temporary wards (west).

The hospital was deactivated in July 1949, when Army and Navy medical facilities were consolidated into what has become the Tripler Army Medical Center. The Territory of Hawaii began negotiations to acquire the facility for a tuberculosis sanitarium in 1950. However, the Marine Corps selected the site to be the "Home of the Fleet Marine Force, Pacific" during 1955. The first Marines took up residence in October 1955 and the Camp was in full operation just two weeks before its dedication in January 1956.

In October 1957, Camp Smith also became the headquarters of the Commander in Chief, U.S. Pacific Command (USCINCPAC) and Commander in Chief, U.S. Pacific Fleet (CINCPACFLT), although the latter was located at Makalapa, near Pearl Harbor. Both commands were headed by the same officer until January 1958, when a separate officer was named to serve as CINCPACFLT.

Since 1957, USPACOM and FMFPAC have been the major tenants sharing the Camp Smith headquarters complex. In the 1990s, Marine Forces Pacific was established and Camp Smith became the headquarters for Commander, Marine Forces Pacific (COMMARFORPAC). In April 1994, Camp Smith, along with the former Marine Corps Air Station, Kaneohe Bay, became part of MCB Hawaii, which is headquartered at Kaneohe Bay.

MARFORPAC is the main Marine Forces command stationed at Camp Smith and is supported by the MARFORPAC Headquarters and Service Battalion. USPACOM, SOCPAC, JIATF-W, Defense Logistics Agency Pacific, Naval Health Clinic Hawaii, MCB Hawaii staff, and other non-Marine Corps units are also stationed at Camp Smith. As part of MCB Hawaii, Camp Smith maintains facilities and provides services to the operating forces. It promotes the well-being, morale, and safety of military personnel, their families, and the civilian workforce at MCB Hawaii installations, including Camp Smith, Manana Housing Area, Pearl City Annex, and Puuloa Training Facility.

3.6.1.3 Historic Buildings and Structures

Many of the buildings and structures within the existing Building 1 Complex are over 50 years old or have World War II or Cold War-era significance and are considered eligible for the NRHP. In addition to NRHP eligibility criteria, the area of potential effect, the character-defining features, and historic preservation priorities for the historic properties are discussed below.

Historic Properties and Eligibility Criteria. The NHPA of 1966 (16 USC § 470w) defines historic properties as "…any prehistoric or historic district, site, building, structure, or object included in or eligible for inclusion in the National Register of Historic Places…". To be considered for eligibility, a property must meet the National Register Criteria for Evaluation (National Park Service, 2014). This process involves evaluating the quality of significance in properties that possess integrity of location, design, setting, materials, workmanship, and feeling as well as an examination of:

(A) Their association with events that have made a significant contribution to the broad patterns of our history; or
(B) Their association with the lives of persons significant in our past; or
(C) If they embody 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; or
(D) If they have yielded, or may be likely to yield, information important in prehistory or history.

Area of Potential Effect (APE). In accordance with 36 CFR §800.4(a)(1), MCB Hawaii established the APE as the area immediately surrounding the Building 1 Complex and adjacent buildings and their associated paved and grassy areas. The APE boundary was based on potential direct effect and covers approximately 10.5 acres extending from Elrod Road to the Camp's northern boundary along Halawa Heights Road (See Figure 3-3 and Appendix A). The Section 106 consulting parties have acknowledged that there may be visual effects to properties beyond the APE that were undetermined, and that needed to be assessed in the HLR.

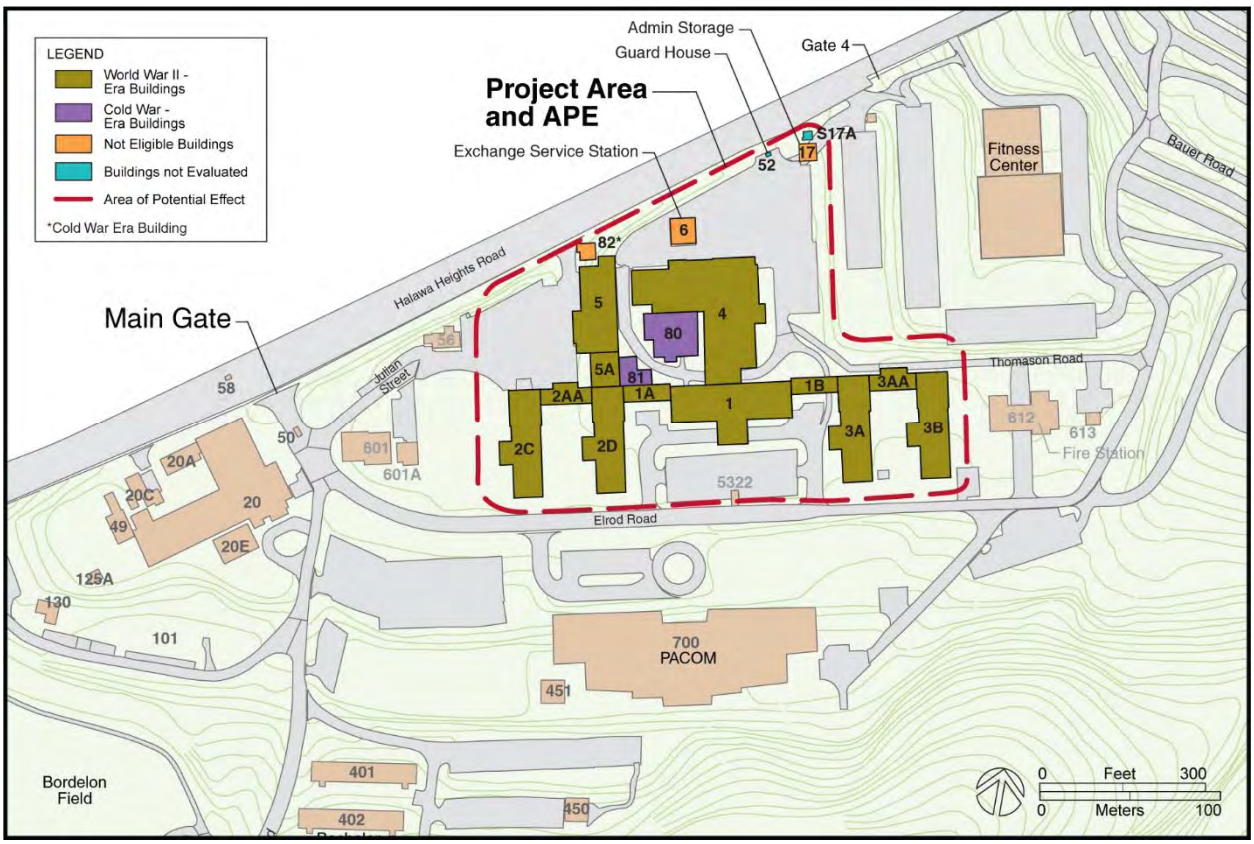

Figure 3-3: Building 1 Complex showing NRHP-eligible properties.

Buildings 17, S17A, and 52 support the Building Complex 1 and were also included within the APE, although they are not directly associated with or connected to the Building 1 Complex. Building 17 was built in 1942 and was the most northern point of the APE boundary that may be affected by the proposed project.

As part of the Section 106 consultation, MCB Hawaii determined that sections of the original AHNH comprising the existing Building 1 Complex (Buildings 1, 1A, 1B, 2AA, 2C, 2D, 3A, 3B, 3AA) were eligible for listing in the NRHP based on the following criteria: their association with WWII and the construction of the period, their relationship to the war patients interned at the base, and their association with architect C.W. Dickey (Criteria A and C, respectively).

At the height of the Vietnam War in 1966-1967, USCINCPAC constructed a new COC (Building 80) and its free-standing communications adjunct (Building 81) at Camp Smith. Both buildings were built as windowless, concrete, bombproof buildings similar to COC complexes built for major commands in the Air Force and Navy. Building 80 is eligible for the NRHP under Criterion A for its function as a COC during the Cold War (MAI 2012:7). Building 81 is also eligible as a support structure for Building 80. In 1971, USCINCPAC added a free-standing "no break" power station (Building 82) for the COC. Building 82 was later modified in 1978 to serve as an uninterrupted power source to protect against electromagnetic pulse induced by a nuclear explosion. Although Building 82 also supports Building 80, it has not been evaluated as NRHP-eligible at this time since it is under 50 years old and does not possess exceptional significance since all the equipment associated with its Cold War use has been removed. Historic properties located within the APE are shown below. (See Table 3-1.)

Table 3-1 Historic Properties within the APE

Building No.	***Building Description***	***NRHP Eligible***	***Year Built***
1	4-story, reinforced concrete hospital administrative center. Building 1 is currently used by MARFORPAC and Joint Command for Admin/OPCON purposes	Yes	1942
1A	Initially constructed as one of several hospital corridors, Admin/OPCON	Yes	1942
1B	Hospital corridor	Yes	1942
2AA	Hospital corridor	Yes	1942
2C	Hospital wing	Yes	1942
2D	Hospital wing	Yes	1942
3A	Hospital wing	Yes	1942
3AA	Hospital corridor	Yes	1942
3B	Hospital wing	Yes	1942
4	Subsistence Building with splinter-proof operating room in basement	Yes	1942
5	Powerhouse and laundry	Yes	1942
5A	Central supply room	Yes	1942
6	Service station	No	1942
17	Storage building	No	1942
80	A 3-story, windowless, concrete building meant to serve as a COC for CINCPAC. Two wings were connected to Facility 80 (Buildings 1 and 4). A fourth windowless story was added in 1978	Yes	1966-67

Building No.	*Building Description*	*NRHP Eligible*	*Year Built*
81	Communications adjunct for Building 80 also built as a windowless concrete building	Yes	1966-67
82	"No break" power station for COC complex	No	1971

Character-defining features of Historic Properties. MCB Hawaii identified architectural materials and features which define the character of the historic properties comprising the existing Building 1 Complex. These character-defining features include the following:

- Configuration of the administration building (Building 1) and the wards connected by a long spine.
- Porte cochere at the entrance (Building 1).
- Appearance of the complex as seen from Elrod Road.
- Massing of Buildings 80 and 81.
- Flat roofs throughout the complex.
- Painted, unadorned exterior concrete walls.
- Fenestration pattern throughout the majority of Buildings 1 through 3, which is fairly intact.
- Double-hung windows.
- Thin concrete overhangs above the windows.

Priorities for the Retention and Reuse of Historic Properties. In addition to evaluating the historic properties, MCB Hawaii established priorities for the retention and reuse of historic properties for the new HQ/OPS Center. These priorities are graphically illustrated and summarized below (See Figure 3-4).

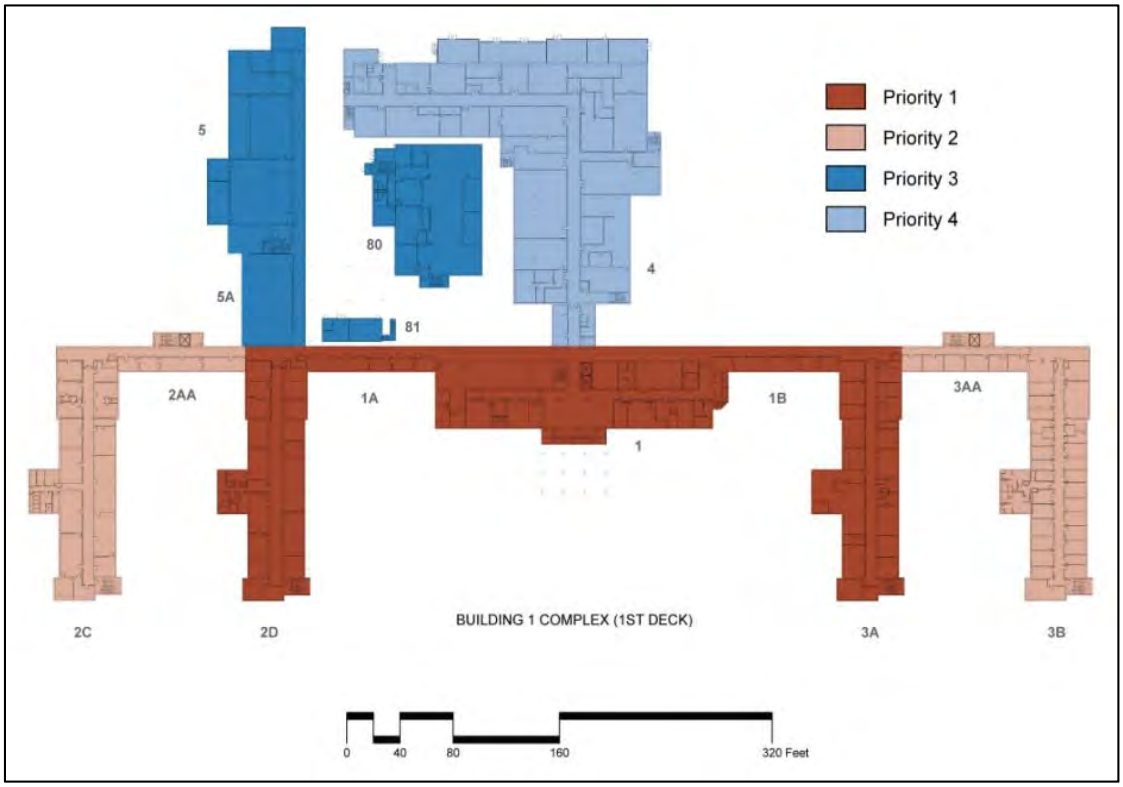

Figure 3-4: Historic preservation priorities for the Building 1 Complex by Priority Level

Priority Level 1. Retains and reuses Buildings 1, 1A, 1B, 2D, and 3A. The original design of the hospital used the administrative building (1) and its corridors (1A, 1B, 2AA, 3AA) to form a central spine to link the wards (2C, 2D, 3A, 3B) and support areas. To convey the original concept, Building 1 and at least one adjacent wing (*e.g.,* 2D, 3A) should be retained and connected to the spine. The Building 1 Complex commands a strong street presence along Elrod Road. Without Buildings 1, 1A, 1B, 2D, and 3A, the other buildings would lose their historic integrity and the cohesiveness and appearance of the complex would be affected. MCB Hawaii found that Priorities 2, 3, and 4 are not viable if the Priority 1 buildings are not retained.

Priority Level 2. The retention and reuse of NRHP-eligible Buildings 2AA, 3AA, 2C, and 3B would reinforce the original hospital design and maintain its visible presence along Elrod Road.

Priority Level 3. Buildings 5, 5A, 80, and 81 are NRHP-eligible but are not visible from Elrod Road.

Priority Level 4. While NRHP-eligible, Building 4 has had several additions, lacks integrity, and is not visible from Elrod Road.

During the Section 106 consultation process, MCB Hawaii determined that the demolition of the eight NRHP-eligible buildings (2AA, 2C, 3AA, 3B, 4, 5, 5A, and 81) under the proposed action would have a direct adverse effect on historic properties. An adverse effect occurs when a project may directly or indirectly diminish the integrity of a historic property by altering any of the characteristics that qualify that property for National Register inclusion. Specifically, if the project diminishes the integrity of a property's location, design, setting, materials, workmanship, feeling, and association, then there is an adverse effect. An example of a direct impact would be the alteration of a building's structural elements, while an indirect impact would be a change in the building's visual setting or appearance. The Section 106 consultation process involved various meetings with the SHPO, the ACHP, the NTHP, and the HHF.

3.6.1.4 Historic Landscape

This section complements the previous section on historic buildings and structures and focuses on the association between the Building 1 Complex landscape and the therapeutic and rehabilitation activities, programs, and goals of the hospital during the war. The findings and discussion provided below are excerpted from the draft Camp H.M. Smith Historic Landscape Report (AECOM 2015) that was identified as a mitigation requirement in the Section 106 MOA.

The National Park Service (NPS) guidance for historic and cultural landscapes is aligned with the National Register and establishes criteria to assess the integrity of a historic property. The NPS guidance defines integrity as the faithfulness of a landscape's historic identity, substantiated by the continued existence of physical characteristics present during its period of significance. One of the seven aspects of historic integrity identified in the NPS guidance relates to "setting"; the physical environment of a historic property or landscape.

As defined by the National Register, "whereas location refers to the specific place where a property was built or an event occurred, setting refers to the character of the place in which the property played its historical role. It involves how, not just where, the property is situated and its relationship to surrounding features and open space." If a landscape is closely associated with an eligible building, structure, or group of buildings but lacks individual distinction, the landscape may be characterized as

the setting for the eligible property. Historic and cultural landscapes, while documented and treated as a cultural resource by the NPS, are not a recognized National Register property type.

The draft HLR (AECOM 2015) notes that the period of significance for the Camp Smith landscape was between 1941 and 1946, and encompasses the WWII activities associated with AHNH. The hospital's historical significance stems from its contributions to modern medical care and innovative therapy programs during WWII to rehabilitate thousands of wounded U.S. servicemen between 1941 and 1946.

The draft HLR documented major changes that have occurred at Camp Smith since 1946 that have diminished the historic integrity of the overall landscape. Major changes include the removal of the installation's temporary wartime features, its change in mission from a hospital to an administrative headquarters, and the addition of modern facilities to support FMFPAC (MARFORPAC predecessor) and USPACOM.

Historic areas and features of the installation's hospital-era landscape that have retained a moderate level of integrity (*i.e.,* moderately diminished) include the Building 1 Complex and courtyards, the Main Gate and the portion of Elrod Road along the south side of the Building 1 Complex, and Building 20 and adjacent swimming pool. Due to their remote location away from other developed areas, Camp Hawkins and Shangri-La retain a high level of integrity (*i.e.,* slightly diminished).

Character-defining views and vistas include the view of the Building 1 Complex from Elrod Road, the panoramic view toward Pearl Harbor from the swimming pool and tennis court areas (located to the southwest of the Building 1 Complex), and the panoramic view toward downtown Honolulu and Diamond Head from Camp Hawkins and Shangri-La. The remaining landscape areas have lost their integrity to the point where the landscape is not recognizable compared to its appearance during the period of significance.

The boundaries for the Building 1 Complex's NRHP-eligible buildings include the buildings' adjacent landscape where those landscape areas support and directly relate to the design significance of the buildings. For example, the three front courtyards (of the Building Complex 1) that face Elrod Road are integral to the building design, layout, and function as built space that, together with other attributes of the buildings (such as fenestration and roofline), help define the designed character of the Building 1 Complex.

Other surrounding areas support the integrity of setting for the NRHP-eligible buildings. Views of the Building 1 Complex from Elrod Road are identified in the draft HLR as character defining for the Building 1 Complex. No other character-defining views of the Building 1 Complex are identified in the draft HLR.

3.6.2 Potential Impacts

The NHPA was enacted to preserve historic properties in the United States, to make federal agencies and the public more aware of historic properties, and to ensure that modern society and historic properties exist in harmony or balance. Section 106 of the NHPA requires federal agencies to consider the effects of their actions on historic properties. It also provides four basic steps for agencies to evaluate the effects of their undertakings on historic properties:

- Gather information to identify properties that may be affected by the project or are eligible for listing on the NRHP.

- Determine how the historic properties might be affected.
- Examine measures to avoid or reduce harm to historic properties and afford consulting parties the opportunity to review and comment on a proposed project.
- Reach an agreement on measures to offset any adverse effects. The resolution of adverse effects generally results in an agreement document (*e.g.,* MOA or Programmatic Agreement) that specifies any required mitigation measures.

3.6.2.1 Action Alternatives

The Action Alternatives would adversely affect a number of historic properties within the existing Building 1 Complex. The alternatives differ in terms of the amount of historic fabric or the number of NRHP-eligible buildings that would be demolished. The impact resulting from the demolition of these buildings and measures to mitigate the demolition of the historic buildings to less than significant levels are discussed below.

Demolition of Historic Buildings and Structures. The historic character and appearance of the Building 1 Complex are defined by nine connected NRHP-eligible buildings (1, 1A, 1B, 2AA, 2C, 2D, 3A, 3AA, and 3B) fronting Elrod Road whose appearance has been relatively unchanged since the 1940s. (See Table 3-2.)

Table 3-2: Buildings (by building number) to be demolished based on the Action Alternative

Action Alternative	*NRHP-eligible Buildings*	*Non-eligible Buildings*	*Total Number of Buildings*
Configuration 1	1A, 1B, 2AA, 2C, 2D, 3A, 3AA, 3B, 4, 5, 5A, 81 (12 buildings)	6, 17, 82 (3 buildings)	15
Configuration 2	2AA, 2C, 3AA, 3B,4, 5, 5A, 81 (8 buildings)	6, 17, 82 (3 buildings)	11
Configuration 3	2AA, 2C, 3AA, 3B, 5, 5A, 81 (7 buildings)	6, 17, 82 (3 buildings)	10

Historic Landscape. The draft HLR indicated that the overall installation landscape lacks integrity due to the widespread loss of hospital-era facilities and landscape character. Some areas still possess integrity, although they have been diminished through the loss of some historic landscape features associated with the significance of the hospital.

In a continuance of the Section 106 consultation, and based on the analysis being conducted as part of the underway HLR process, MCB Hawaii notified the consulting parties by letter dated September 17, 2015 of its determination that the Building 1 Complex was not eligible for listing as a historic district because it lacked integrity as a historic district, and at the same time acknowledged that the individual buildings that comprise the Building 1 Complex remain eligible for listing (cited correspondence is provided in Appendix A-1). The SHPO concurred with the MCB Hawaii determination by letter dated October 30, 2015, and MCB Hawaii did not receive comments from the ACHP or NTHP. While concurring with MCB Hawaii's findings on district ineligibility, the HHF sought confirmation that the individual buildings also included their setting (described in Section 3.6.1.4 above). MCB Hawaii acknowledged these areas help support the integrity of setting for the NRHP-eligible buildings.

3.6.2.2 No-Action Alternative

The No-Action Alternative would not involve the demolition of historic properties and would therefore avoid the adverse effects identified with the action alternatives.

3.6.3 Mitigation Measures

This section discusses the Section 106 process that was conducted and the resulting MOA. In accordance with the NHPA, Section 106 consultation by MCB Hawaii was initiated because the action alternatives would result in adverse effects to historic properties. Section 106 consultation commenced in November 2012 and concluded in April 2015. During the consultation process, numerous alternatives were considered, including the four Building 1 Complex alternatives, a Bordelon Field alternative, and the BEQ site alternative that was introduced by the Section 106 consulting parties. As a result of Section 106 consultation, MCB Hawaii and the consulting parties were able to agree upon Configuration 2, an alternative that best addressed mission needs and historic preservation requirements. The agreement was codified in an MOA between MCB Hawaii, the SHPO, and the ACHP, with the HHF signing as a concurring party (Appendix A).

3.6.3.1 Historic Buildings and Structures

The MOA contains various provisions to mitigate adverse effects on historic properties including stipulations that govern design guidelines, preservation of historic landscapes, documentation, and project execution. For example, all rehabilitation work on NRHP-eligible buildings would be designed and executed in accordance with SOI "Standards for the Treatment of Historic Properties" with guidelines for preserving, rehabilitating, restoring, and reconstructing historic buildings. Measures to mitigate the demolition of the NRHP-eligible buildings include the preparation of an HLR in accordance with National Park Service Guide to Cultural Landscape Reports and the SOI's Standards with guidelines for the treatment of historic landscapes. To document historic buildings prior to demolition, an SOI-qualified architectural historian or historical architect would submit a Historic American Building Survey report and photo documentation.

The provisions included in the MOA would ensure that all new construction and renovation activities are designed, constructed, and executed to retain the character-defining features associated with the original buildings, and to continue to maintain the visual character and presence of the original facility. Compliance with the stipulations set forth in the MOA would mitigate the adverse effect resulting from the demolition of the eight NRHP-eligible buildings (Buildings 2AA, 2C, 3AA, 3B, 4, 5, 5A, and 81) to less than significant levels.

3.6.3.2 Historic Landscape

Due to the changes that have occurred over time at Camp Smith and the diminished integrity of the overall historic WWII hospital campus, the Building 1 Complex, one of few extant WWII hospital campus features, lacks the integrity to be considered eligible for listing in the NRHP as a historic district. However, the Building 1 Complex and their associated setting (*e.g.,* courtyards, landscaping, grassy/paved areas, open space) are integral to the historic integrity and Building 1 Complex's eligibility to the NRHP. The MOA (Appendix A) includes a section entitled "preserving landscapes" in recognition of the importance of the subject; with the principal recommendation being the preparation of the HLR, and that recommendations of the HLR be implemented. Other sections of the MOA stipulate requirements for a parking study incorporating HLR recommendations and consideration of a parking structure to reduce effects of surface parking lots on the landscape, retention of several of the Building 1 Complex courtyards and open space created by the demolition of the two wings (see Figure 2-3), and

specific provisions to protect view sheds of the remaining historic buildings. The draft HLR identified the Elrod Road frontage and façade of the Building 1 Complex as an integral part of the NRHP eligibility of the Building 1 Complex and is one of several Landscape Management Areas noted in the draft HLR. The final HLR will outline specific recommendations to maintain this area's historic character.

3.7 Infrastructure

3.7.1 Affected Environment

The affected infrastructure is presented in the following sections.

Roads. Vehicular access to Camp Smith is provided by Halawa Heights Road, a two-lane, CCH-owned road along the northern boundary of the Camp with a posted speed limit of 25 mph. Regional access to Halawa Heights Road is via Moanalua Freeway (H-201), which is located at the base of Halawa Heights, about 0.5 miles downslope to the southwest of Camp Smith. The H-3 Interstate runs through Halawa Valley to the east and provides direct access to the MCB Hawaii Kaneohe Bay.

Access and Circulation. Vehicle access to Camp Smith from Halawa Heights Road is provided by various controlled-entry gates including the Main Gate at the intersection of Elrod Road (See Figure 3-5). Vehicle circulation system within Camp Smith is generally satisfactory and is characterized by two-lane roads with one-way lanes in parking areas. Elrod Road and several secondary roads provide vehicle access and circulation throughout the Camp (See Figure 3-5). Due to topography, some roads in the Camp are narrow, steep, and winding. To improve access and circulation, a continuous road around the perimeter of the new HQ/OPS Center site would be provided along with separate controlled entry and loading/delivery areas for both MARFORPAC and the Joint Command, and pedestrian walkways between the Physical Fitness Center and the new HQ/OPS Center.

Parking. Vehicle parking capacity at Camp Smith was estimated at 1,514 stalls in an internal 2006 assessment. A significant amount of parking is provided on terraced areas cut into the hillside to the northeast of the Building 1 Complex and it's generally acknowledged that the availability of parking is problematic. A total of 640 parking stalls were located within parking lots in the vicinity of the project area. The locations of the parking lots are designated by numbers or letters shown in Figure 3-5. While the current number of parking stalls in the project area cannot support the full parking requirements for the existing Building 1 Complex, upslope parking areas to the north and east of the project area are sufficient to deal with the shortfall.

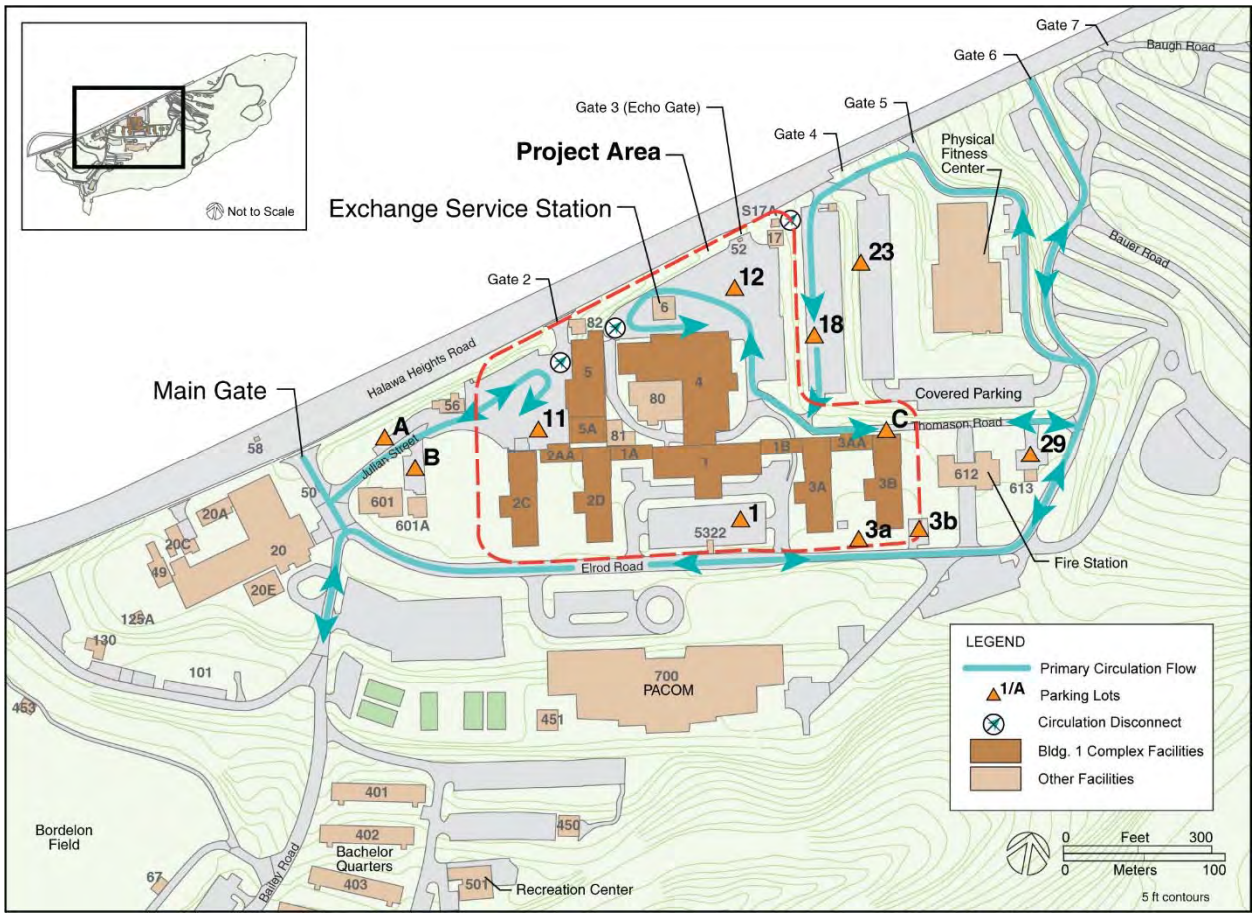

Figure 3-5: Entry Points and Vehicle Circulation Pattern within Camp Smith

Force Protection. Vehicular circulation currently occurs within 82 ft (25 m) of the existing Building 1 Complex and below the bridging structures between Buildings 1 and 4, Buildings 1A and 80, and from Building 3AA to the parking areas north of the Complex – less than current allowable standoff distances. Barriers have been installed to block access to the driveway below Building 1B but unpermitted parking occurs around most buildings of the complex. The new HQ/OPS Center would comply with DoD force protection standards for buildings in accordance with appropriate United Facilities Criteria (UFC).

Water Supply. Drinking water for Camp Smith is provided by the Navy's Pearl Harbor water system which is owned and operated by the Commander Navy Region Hawaii (CNRH). Potable water for the Camp is stored in three tanks in the upper end of the Camp and distributed throughout the installation by various gravity-flow transmission lines. Backup water service for the Camp is provided by the Honolulu Board of Water Supply system. The existing water system serving Camp Smith provides sufficient flow and pressure to meet present and future water demands.

Wastewater. The wastewater system at Camp Smith is owned and operated by CNRH. It consists of a series of gravity lines that convey wastewater to the Navy's Pearl Harbor system. Sewage is eventually conveyed to the wastewater treatment plant at Fort Kamehameha at Joint Base Pearl Harbor/Hickam which provides advanced secondary treatment and discharges the effluent into Malama Bay through a deep ocean outfall. The capacity of the Navy's wastewater treatment plant is currently limited to

existing wastewater volume. The existing Camp Smith sewer system can adequately serve current and future wastewater demands.

Storm Drainage. Infrastructure for the storm drainage system at Camp Smith has been expanded during subsequent development phases at the Camp. The existing storm drainage system adequately serves the project area, and utilizes a network of drainage inlets, pipes, and outfalls to convey runoff to natural drainage areas to the north and south, downslope of the Camp. The existing drainage system serving Camp Smith captures runoff from the study area and conveys it through a series of pipes and culverts before it discharges into a ravine on the east side of the Camp through two primary outfalls. The main drain pipe is located under the driveway below Building 1B. Redirecting storm water to low impact development (LID) retention features (*e.g.,* drainage swales) is not feasible due to terrain and soil characteristics**,** but utilizing buried catchment basins (a LID feature) is a practicable measure.

Electrical. Oahu's electric power is produced by Hawaiian Electric (HE). Camp Smith purchases commercial power from HE via NAVFAC Hawaii. Power is received at an HE Substation at the southwestern corner of Camp Smith**,** with two circuits feeding the on-base station next to the HE substation. Power is further converted by transformers, which feed the distribution system that is owned and operated by CNRH.

HVAC. The heating, ventilation and air conditioning (HVAC) system for the existing Building 1 Complex is a combination of central air conditioning systems, air-cooled package chillers, mini-split systems, and window-mounted units. Generally piecemeal, these systems are old, inefficient, and do not meet LEED 2009 or EPAct 2005 energy efficiency requirements. Moisture collection and mildew were observed throughout the Building 1 Complex and attributed to over-cooling, moisture penetration, wrong-sized equipment, and poor operational performance.

Telecommunications. Camp Smith is served by multiple telecommunication systems and vendors.

Solid Waste Disposal. Solid waste collection at Camp Smith is performed by a private contractor that provides various-sized dumpsters at designated locations throughout the Camp. The contractor transports the waste to the municipal H-Power facility in the Campbell Industrial Park and the Waimanalo Gulch Landfill for disposal. Construction materials containing hazardous materials may have been used in the construction of the existing Building 1 Complex. Buildings and structures built during World War II and the Cold War era may contain lead-based paint on building surfaces, polychlorinated biphenyls (PCBs) in light ballasts, and asbestos-containing construction materials.

Fire Protection. The Camp Smith fire station lies east of, and adjacent to, the existing Building 1 Complex. The original Building 1 Complex is constructed primarily of concrete and that many of the additions were built with wood or other combustible materials. The study also notes that the most of existing complex is served by fire sprinkler protection and that wet standpipe systems are not provided in all areas. A fire alarm system extends to most areas of the Complex. The Building 1 Complex is classified as Type-V nonrated construction (Type V-B) due to the multiple areas with combustible construction.

Sustainable Building Practices. Developed by the U.S. Green Building Council, LEED-certified construction evaluates eco-friendly construction practices based on a point (credit) system. As a performance-oriented system based on accepted energy and environmental principles, LEED credits are

earned for satisfying criteria designed to address specific environmental impacts inherent in the design, construction, operation, and maintenance of buildings.

The system, which awards silver, gold, or platinum ratings to energy-efficient buildings, is based on the Council's "LEED for New Construction and Major Renovations Rating System." In addition, LEED certification is intended to promote design and construction practices that increase profitability while reducing the negative environmental impacts of buildings. These practices include improving occupant health and well-being, through the reduction of greenhouse gases (GHG) in the atmosphere.

To comply with Federal building performance standards and sustainable design requirements mandated by the EPAct 2005 and Executive Order 13693, "Planning for Federal Sustainability in the Next Decade" (March 19, 2015), the Navy and Marine Corps requirements stipulate that programming, designing, and constructing new facilities meet the following objectives:

- Attain the LEED green building rating of Silver.
- Comply with the required provisions set forth in the American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) Standard 90.1-2004.
- Achieve energy consumption levels that are at least 30 percent more efficient than the baseline level established by Standard 90.1-2004.

Attainment of LEED credits would also fulfill the Navy's LID Policy (2007) to achieve no net increase in storm water volume, sediments, or nutrients for major renovation and new construction projects**,** and to reduce installation reliance on aging storm-water management infrastructure, a requirement that went into effect for the Marine Corps in 2011.

3.7.2 Potential Impacts

The following section discusses potential infrastructure impacts that could occur as a result of the action alternatives, as well as measures to minimize any potential impacts.

3.7.2.1 Action Alternatives

Roads/Parking. To minimize traffic and parking-related impacts during construction, a Traffic Management Plan (TMP) would be implemented by the building contractor to control material deliveries and work schedules and utilize measures such as scheduling deliveries for off peak hours, staggering starting times for construction workers, using vanpools, and providing central offsite parking and shuttling workers to the jobsite. Construction vehicles, equipment, and materials could be stored and secured onsite to minimize vehicle movement. The building contractor would ensure that construction vehicles do not impede traffic along Halawa Heights Road and within the Camp and would obtain a permit from the State Department of Transportation should any oversized and/or overweight material and equipment need to be transported on state highways. The TMP would help ensure that contractor-related parking impacts do not affect the availability of parking for assigned personnel and would ensure relevant force protection standoff distances are observed.

Drainage. The demolition of some of the affected buildings, driveways, and parking areas would result in the creation of new open space areas which would improve drainage by providing additional permeable surfaces. The construction of new buildings would increase runoff volume due to the additional impervious surfaces of roofed/paved areas. The storm water drainage system serving the existing Building 1 Complex is old and would be replaced with a modern, effective system for the new HQ/OPS Center. Since site work would exceed 1-acre, an NPDES Permit for general coverage would be

obtained from the State DOH-Clean Water Branch for the discharge of storm water associated with construction activities such as clearing, grading, and excavation. BMPs for the upkeep of the storm drainage system would be implemented to ensure that the operational capability of the system is maintained.

Solid Waste Disposal. Construction waste material would result in a slight (proportional) increase in the amount of waste presently being generated at Camp Smith. The building contractor would be responsible for the disposal of all construction waste material which would be transported to an appropriate construction/demolition landfill for disposal. To the extent possible, remnant and reusable construction materials would be reused or provided to a commercial construction materials recycling facility such as Base Yard Hawaii.

Hazardous Waste Disposal. Renovation and demolition work for the new HQ/OPS Center may involve the removal and disposal of hazardous materials (*e.g.,* asbestos, lead-based paint) that may be present in buildings, structures, or fixtures built or installed prior to the advent of modern, non-hazardous materials. Any hazardous materials identified during construction would be abated or encapsulated by qualified personnel to minimize risks to public health and welfare. Any materials determined to be hazardous would be removed, handled, and disposed of in accordance with 40 CFR 260 through 270, 49 CFR 171-178 and State DOH standards set forth in Chapter 11-501, HAR (*Asbestos Requirements*). The building contractor would be responsible for managing any accidental spills or releases during the construction and for implementing measures for the handling and disposal of such materials in accordance with applicable Federal and State requirements.

Other Infrastructure Components. The water, wastewater, electrical, HVAC, telecommunications, and fire protection infrastructure serving the existing Building 1 Complex is old and would be replaced with modern effective systems which incorporate sustainable building practices and energy and water-efficient features and measures. The water and energy-efficient upgrades for the new HQ/OPS Center would reduce the amount of wastewater generated by the project and would not have an adverse impact on the Pearl Harbor wastewater collection system. In the long term, the infrastructure upgrades would improve operational efficiency and would have a beneficial impact on the environment. In addition, the action alternatives were the subject of a LEED certification assessment which indicated that the LEED Silver rating required by the U.S. Navy is feasible and attainable without a significant capital investment beyond that of a typical construction project.

3.7.2.2 No-Action Alternative

Under the No-Action Alternative, the action alternatives would not occur and there would be no change to the existing infrastructure. Therefore, no significant impacts to transportation, utilities, or facilities would occur with implementation of the No-Action Alternative.

3.8 Socio-Economic Environment

3.8.1 Affected Environment

This section provides a summary description of the socio-economic environment around Camp Smith and the surrounding area. Camp Smith personnel loading is estimated at approximately 3,200 representing just under 10% of the total armed forces labor force in the CCH (DBEDT 2013). Camp Smith also provides several barracks facilities and family housing units. Halawa is a census-designated place (CDP) that encompasses Camp Smith with a 2010 population of 14,014 residents (U.S. Census, 2010). The town nearest to Camp Smith is Aiea to the southwest, which had a 2010 population of 9,338

residents. In comparison, the 2010 population for the State of Hawaii was 1,360,301 and the population of the CCH was 953,207. Major single-family residential developments near Camp Smith include Halawa Heights Tract, Halawa Heights Subdivision, Halawa Hills Estates Subdivision, Halawa Valley Estates, and Aiea Homesteads. Two public schools are located within close proximity and downslope of Camp Smith: Gus Webling Elementary School, 0.8 miles and Aiea Intermediate School, 1.05 miles (DBEDT, 2012).

3.8.2 Potential Impacts

3.8.2.1 Action Alternatives

Construction-related employment would have a positive impact on the local economy due to spending by those employed in construction jobs and businesses providing goods and services to the construction industry. Construction-related spending would also benefit businesses in other commercial sectors (*e.g.,* stores, restaurants), while construction-related tax revenues would benefit the State and local economy. In the long term, the new HQ/OPS Center would continue contributing to the economy through the payment of wages and the purchase of goods and services for the operation and maintenance of the center. The proposed action would not alter population or demographic characteristics nor would it generate a new or secondary demand for housing or any associated increase in population.

3.8.2.2 No-Action Alternative

Under the No-Action Alternative, the action alternatives would not occur and there would be no change to the socio-economics of the CCH or state. Therefore, no significant impacts would occur with implementation of the No-Action Alternative.

3.9 Cumulative Impacts

Cumulative impacts on environmental resources result from the incremental effects of development and other actions, evaluated in conjunction with other past, present, and reasonably foreseeable future actions regardless of who (government, private sector) initiates the action. Cumulative impacts can result from actions which are individually minor, but collectively significant, and which take place over a period of time (40 CFR Section 1508.7).

From a cumulative perspective, the development of the new HQ/OPS Center recognizes MARFORPAC's important operational role in national security and acknowledges that the existing Building 1 Complex is an aged and functionally inadequate facility requiring replacement and/or substantial upgrades. The modernization project is considered an "infill" project within a previously developed site that does not involve a change of primary use or increase in size. The action alternatives would bring the entire Building 1 Complex up to current codes and standards, which would increase the readiness, security and safety of personnel working in the complex. The adaptive reuse approach being followed in the action alternatives seeks to minimize the amount of new construction and the attendant resources consumed by new construction activities. The project does not contemplate changes in personnel loading (fluctuations of which influence an array of potentially indirect and cumulative effects on public infrastructure and services), it does not require offsite infrastructure improvements such as major road construction, downstream wastewater treatment conveyance and treatment system improvements, or potable water source and storage systems. Sustainable design practices required to be employed in the modernization project would increase overall energy efficiency, reduce overall water use and wastewater flow, and increase storm water retention and storm water quality, in effect reducing the long term overall impact of the Building 1 complex on the environment. Construction-period activities**,** as discussed earlier, would generate short term impacts that would be mitigated by following best practices enumerated above.

Past, present, and reasonably foreseeable DoD projects include the recently completed Physical Fitness Center and planned improvements to the Main Entry Control Point (ECP) along Halawa Heights Road and the new Pass and ID Office as summarized below.

1. ***Physical Fitness Center (Status - Complete)*:** This project was completed in March 2014 and replaced the Marine Corps Community Services Fitness Center which was formerly located in Building 2C of the Building 1 Complex. The new Fitness Center encompasses about 29,850 GSF and includes full-sized basketball and volleyball courts, an aerobic and exercise area, cardiovascular and strength-training equipment, showers, locker rooms, saunas, and 134 onsite parking stalls plus an additional 90 offsite stalls at two locations within Camp Smith: south of Building 20 at Baily Road and south of Building 14 at Bauer Road. The Physical Fitness Center Project also provided a controlled-entry service area and elevator tower, stairs, and walkways for pedestrian access to the facility.
2. ***New Entry Control Point/ID Office (Status - Planned)*:** This project is to construct a new main gate/entry control point and a pass and identification (ID) office. A new main gate would be located north of the existing main gate near the intersection of Halawa Heights Road and Puumakani Street and would fully comply with AT/FP requirements. The new ECP would be located just north of the existing main gate and the installation's fence line would be relocated to the east edge of the site.

The Physical Fitness project represented another modernization action, replacing an existing fitness center, and geared to improving the quality of life and readiness of personnel assigned to Camp Smith. The planned ECP project is an outgrowth of DoD anti-terrorism and force protection standards to improve installation security. The implementation time frame for the MARFORPAC HQ/OPS Center is indeterminate since project planning, design, and construction are dependent on Federal funding and priorities.

Cumulative impacts associated with construction activities would include temporary increases in construction employment, local traffic volumes, ambient noise levels, storm water runoff potential, and fugitive dust and vehicular exhaust emissions. Best management practices and other mitigation measures would be implemented during the construction period to address these temporary effects.

In addition to the foreseeable capital improvements, there are a range of continuing and foreseeable sustainment, repair, and maintenance activities to maintain and extend the useful economic life of installation facilities. These are current and will need to be continued when the new facilities become operational. The proposed action and other recent or reasonably foreseeable future projects would not adversely affect climate, air quality, noise, topography, soils, or flood hazard parameters; nor would they have a significant impact upon biological, water, scenic, or visual resources, or have adverse impacts on land use, infrastructure or socio-economic conditions.

As noted in Section 3.6.2, the action alternatives would have an adverse effect on cultural resources, which is reduced to less than significant levels through compliance with stipulations set forth in the MOA. From a cumulative perspective, the Camp Smith site has evolved over several major development periods, from the planation era, through its early development as the Aiea Heights Naval Hospital and now as a headquarters location for the Nation's military commands, and the facilities and associated landscapes have been repurposed to support evolving requirements. From a historic perspective, changes that have occurred from the period of significance (*i.e.*, the WWII period in which the AHNH operated) are considered the most relevant. Numerous reports have documented the loss of a number of the original

AHNH buildings and the draft HLR documented the diminishment and sometimes loss of the installation's landscape integrity. The Section 106 consultation conducted as part of the Building 1 Complex redevelopment plan recognized these historically adverse changes and the resultant MOA identified a number of mitigation strategies and stipulated procedures to improve cultural resource management and awareness into the future.

Climate Change. The earth's climate is affected by energy entering and leaving its atmosphere, which can be affected by both natural and human factors, including variations in the sun's energy reaching the planet, changes in the reflectivity of its atmosphere and surface, and changes in the amount of heat retained by its atmosphere. When energy from the sun reaches the earth's surface, it can either be reflected back into space or reabsorbed by the earth. After it is absorbed, the energy can be released back into the atmosphere as heat (*i.e.,* infrared radiation) (U.S. EPA, June 28, 2012). GHG emissions absorb energy, resulting in the slowing or prevention of heat loss back into space. The key GHGs emitted by human activities include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and fluorinated gases. In 2004, energy supply (*i.e.,* the burning of coal, natural gas, and oil for electricity and heat) was the largest source of global GHG emissions (26%), followed by industry (19%), land use change and forestry (17%), agriculture (14%), transportation (13%), commercial and residential buildings (8%), and waste/wastewater (3%) (U.S. EPA, June 13, 2012).

Though individual projects are unlikely to have significant impacts on global climate change, they collectively may have cumulative effects when their individual GHG emissions are combined over time. The action alternatives would generate GHG emissions during demolition, renovation, and construction work for the new HQ/OPS Center. However, most of these GHG emissions would be temporary in nature. Operation of the completed HQ/OPS Center would generate gases primarily from vehicles; however, this does not represent an increase over current levels since personnel loading and associated privately-owned vehicle traffic is not expected to change due to the redevelopment period.

Summary

The action alternatives would not result in any long-term impacts that could not be mitigated through various measures such as the implementation of BMPs, adherence to regulatory requirements, and compliance with permit stipulations, including the Section 106 MOA. Short term impacts related to construction activities are temporary and would also be mitigated by BMPs, adherence with regulatory requirements, and compliance with permit stipulations.

No-Action Alternative. The No-Action Alternative would not cause an adverse cumulative impact upon the natural or manmade environment in the project area because present site conditions would be maintained.

3.10 Consistency with the Objectives of Federal Land Use Policies, Plans, and Controls

3.10.1 Coastal Zone Management Act

The U.S. Congress noted in the CZM Act of 1972 (16 USC § 1451 *et seq*.) a national interest in the effective management, beneficial use, protection and development of the coastal zone. In Hawaii, the entire state falls within the coastal zone boundary with few exceptions. The CZM Act states that land subject solely to the discretion of the Federal government, such as federally owned or leased property is excluded from the State's coastal zone (*i.e.,* Camp Smith). However, Federal activities that directly affect the coastal zone are to be conducted in a manner consistent with the enforceable policies of federally approved State program to the extent practicable. The proponent of the action (MCB Hawaii) must

determine whether the action would affect any coastal use or resource in a coastal state. In 2009, the Navy and the Hawai'i CZM Program updated a list of Navy/Marine Corps *de minimis* activities which are expected to have insignificant direct or indirect coastal effects and are not subject to further review by the Hawai'i CZM Program.

The adaptive reuse of the existing Building 1 Complex, including the construction of new facilities and improvements to existing facilities, falls within Item 1 on the *De Minimis* Activity List: "Construction of new facilities and structures wholly within Navy/Marine Corps controlled areas (including land and water) that is similar to present use and, when completed, the use or operation of which complies with existing regulatory requirements." The proposed demolition activities fall under Item 11 of the *De Minimis* Activity List: "Demolition and disposal involving buildings or structures when done in accordance with applicable regulations and within Navy/Marine Corps controlled properties."

The relevant project mitigation/general conditions are as follows:

- All demolition activities would occur on Navy/Marine Corps property.
- All fill material would be protected from erosion as soon as practicable
- All exposed soil would be protected from erosion and stabilized as soon as practicable.
- The Navy/Marine Corps has determined that no species or habitats protected under the Endangered Species Act would be affected by the action.
- Consultation pursuant to Section 106 of the NHPA has been completed (MOA provided in Appendix A).

This environmental assessment is being prepared in compliance with NEPA, and Navy/Marine Corps staff shall notify the State CZM of *De Minimis* Activity List applicability for projects which require an Environmental Assessment.

In an e-mail dated March 3, 2016, the State CZM office acknowledged MCB Hawaii's notification of its *De Minimis* determination and the preparation of this Environmental Assessment (Appendix B).

3.10.2 MCB Hawaii Land Use and Development

MCB Hawaii provides guidance for land use and facility development at all of its installations. Its internal plans contemplates construction of the MARFORPAC operations center on the existing Building I Complex site at Camp Smith. The proposed action is therefore consistent with MCB Hawaii's land use and development plan for Camp Smith.

3.10.3 MCB Hawaii Cultural Resources Management

All installations under the jurisdiction of MCB Hawaii are guided by internal MCB Hawaii planning and decision documents for cultural resources management and specific compliance procedures. These documents integrate cultural resource program requirements with ongoing mission activities and other planning documents and metrics to help preserve and protect significant cultural resources on MCB Hawaii installations which include archaeological sites and architectural properties that occur as separate entities, as well as elements within districts. The preservation and protection of cultural resources is to be carried out in a manner that is compatible with the installation mission, satisfies legal compliance requirements, and is consistent with cultural resources management principles.
MCB Hawaii identifies Camp Smith as a low archaeological sensitivity area and the possibility of archaeological resources being discovered during ground-altering activities is low.

The proposed action would involve the demolition of eight NRHP-eligible buildings (2AA, 2C, 3AA, 3B, 4, 5, 5A, and 81) and three non-eligible buildings (6, 17, and 82). MCB Hawaii's internal planning and decision documents for cultural resources management stipulates that a cultural resources manager (CRM) shall be notified of any activity that may potentially affect a resource on the list of buildings and structures built at Camp Smith before 1960 (except for the non-eligible buildings). The CRM would be responsible for reviewing the activity and its impacts before the commencement of the activity. The MCB Hawaii CRM was notified of the proposed action and has participated in the Section 106 consultation process which resulted in the development and execution of an MOA which includes mitigation for the demolition of the historic buildings. The MOA includes provisions to document the buildings to be demolished and sets forth design guidelines and mitigation protocol which would be utilized during implementation of the project. Under the No-Action Alternative, the use of the existing Building 1 Complex would continue and the functional inadequacies and security issues of the present facility would continue to exist.

3.10.4 MCB Hawaii Natural Resources Management

MCB Hawaii's "Integrated Natural Resources Management Plan" Update (MCB Hawaii 2011) guides implementation of MCB Hawaii's integrated natural resources management program on MCB Hawaii properties, and was prepared in accordance with the Sikes Act Improvement Act of 1997. It follows an ecosystem management approach involving a suite of management actions within seven different Course of Action areas of concern representing a full array of natural resources and concerns. Applicable provisions from this plan are discussed below.

Goal 7.3: Watershed Management

Use an ecosystem-based watershed approach to managing water quality, erosion, and flow/flooding issues on MCB Hawaii land.

Objective 7.3.3: Implement BMPs to improve watershed health.
***Discussion*:** BMPs would be utilized during demolition, renovation, and new construction activities. BMPs include, but are not limited to, the installation or retrofitting of devices to improve storm water retention, reduce flood potential, and increase bio-filtration, as well as other approaches to reduce non-point source pollution. For example, "green" elements, such as the use of "grasscrete" in the design of parking areas, would reduce paved areas and increase infiltration.

Goal 7.5: Grounds Maintenance and Landscape Management

Maintain grounds and landscaped areas through cost-effective, environmentally sound, sustainable grounds maintenance and landscaping practices, emphasizing use of native plants, to support training needs, recreation, and natural resources compliance.

Objective 7.5.1: Take a sustainable landscape approach to improve grounds maintenance and landscape management.

Discussion: The use of drought-tolerant, native plant species would provide a sustainable approach to improve landscape maintenance and management. Provisions for the use of these plant materials would be incorporated into the landscaping plan for the new HQ/OPS Center.

Chapter 4 List of Consulted Parties

Federal Agencies

Advisory Council on Historic Preservation
(*Section 106 Consultation and Review*)

State Agencies

Department of Business, Economic Development and Tourism - Office of Planning
(*Consultation for Navy/Marine Corps de minimis activities under the Coastal Zone Management Act*)

Department of Land and Natural Resources, State Historic Preservation Division
(*Section 106 Consultation and Review*)

Organizations

Historic Hawaii Foundation
(*Section 106 Consultation and Review*)

National Trust for Historic Preservation
(*Section 106 Consultation and Review*)

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Appendix A

NHPA Section 106

Memorandum of Agreement

MEMORANDUM OF AGREEMENT (MOA)
AMONG
MARINE CORPS BASE (MCB) HAWAII,
THE
HAWAII STATE HISTORIC PRESERVATION OFFICER (SHPO), AND
ADVISORY COUNCIL ON HISTORIC PRESERVATION (ACHP)
REGARDING
THE PROPOSED CONSOLIDATED AND ADJOINING FACILITY FOR MARINE CORPS FORCES PACIFIC OPERATIONS AND JOINT COMMAND COMPLEX,
MARINE CORPS BASE HAWAII CAMP SMITH

WHEREAS, Marine Corps Base (MCB) Hawaii proposes to demolish Buildings 2AA, 2C, 3AA, 3B, 4, 5, 5A, 6, 17, 81, and 82 to construct a new consolidated and secured adjoining facility; and, rehabilitate Buildings 1, 1A, 1B, 2D, 3A, and 80 for Marine Corps Forces Pacific (MARFORPAC) Operations and Joint Command Complex (hereafter referred to as the "Undertaking");

WHEREAS, the Undertaking would consolidate and co-locate MARFORPAC Operations Command, Special Operations Command Pacific (SOCPAC), and Joint Interagency Task Force (JIATF)-West (hereafter, Joint Command) at Camp Smith on the Island of O'ahu to provide an adequate, consolidated, secure, and efficiently configured facility; and

WHEREAS, per 36 CFR §800.4(a)(1) MCB Hawaii has initially established the Undertaking's area of potential effects (APE) as the immediate area surrounding each facility as shown on the map in Appendix A and Consulting Parties acknowledge there may be visual effects as yet undetermined to properties outside the APE; and;

WHEREAS, throughout this agreement, Buildings 1, 1A, 1B, 2C, 2AA, 2D, 3A, 3AA, 3B, 4, 5, and 5A are collectively designated as the "Building 1 Complex". Other adjacent buildings affected by the Undertaking include Buildings 6, 17, 80, 81, and 82. Buildings 6, 17 and 82 are not eligible for the National Register of Historic Places (NRHP). Buildings 1, 1A, 1B, 2C, 2AA, 2D, 3A, 3AA, 80and 81 are eligible for listing on the NRHP under criteria A and C; and Buildings 3B, 4, 5, and 5A are eligible for the NRHP under criterion A; and

WHEREAS, the Building 1 Complex played a significant role during World War II (WWII) as part of a recuperation/rehabilitation hospital campus known as Aiea Heights Naval Hospital, which fostered troop recovery. It was an "Industrial Occupational Therapy" complex and included farming, carpentry, mechanics, clerical duties, laundry duties and recreational facilities as part of the recovery program. Within the hospital complex were sun rooms, a library, an auditorium, 6-lane bowling alley, game rooms, lounges and writing rooms. It was the largest military hospital outside of the continental United States and designed by a renowned local architect, C.W. Dickey; and

WHEREAS, there are other extant buildings from the original hospital campus (Buildings 20 and 306) that are considered individually eligible for the NRHP that fall outside of the APE, and should be accounted for in the design considerations of the Building 1 Complex; and

WHEREAS, after WWII, the Building 1 Complex became the headquarters of Commander in Chief Pacific (CINCPAC) and adjacent buildings (Building 80, 81, and 82), built in the late 1960s, became the Command Operations Center (COC) for CINCPAC. Building 80 is a monolithic, windowless, freestanding, concrete bomb-proof building. Building 80 will become an integral part of Building 1 Complex Annex and will no longer be a freestanding building, causing a substantial loss of historical setting and integrity as a Cold War complex. This COC played a significant role during the Cold War period; and

WHEREAS, MCB Hawaii has studied various alternatives to avoid, minimize, and mitigate adverse effects to these historic properties; and

WHEREAS, pursuant to 36 CFR §800.5(a)(1), MCB Hawaii has determined that the Undertaking, which will demolish Buildings 2AA, 2C, 3AA, 3B, 4, 5, 5A, 6, 17, 81, and 82 to construct a consolidated and secured adjoining facility; and, rehabilitate Buildings 1, 1A, 1B, 2D, 3A, and 80; will have a direct adverse effect on historic properties; and an indirect adverse effect to the Aiea Heights Naval Hospital site as a whole; and

WHEREAS, MCB Hawaii has awarded a contract to conduct a parking study of the subject area in September 2014 that is slated for completion by October 2015 to be an integral part of the landscape survey; and

WHEREAS, there are no known archaeological resources eligible for the NRHP within the APE; and

WHEREAS, the Office of Hawaiian Affairs has been invited but has respectfully declined to participate; and

WHEREAS, MCB Hawaii has consulted with the Hawaii State Historic Preservation Officer (SHPO) to resolve adverse effects on historic properties; and

WHEREAS, pursuant to 36 CFR §800.6(a)(1) of the NHPA, 16 U.S.C. 470h-2(f), MCB Hawaii has notified the Advisory Council on Historic Preservation (ACHP) and the ACHP has agreed to participate in this consultation; and

WHEREAS, pursuant to 36 CFR §800.6(c)(3), MCB Hawaii has invited Historic Hawaii Foundation (HHF) and National Trust for Historic Preservation (NTHP) to participate in the consultation and to sign this MOA as Concurring Parties; and

WHEREAS, MCB Hawaii will continue to work with the consulting parties to identify and preserve contributing elements of the historic landscape, and new landscapes created by the demolition of historic properties, including open spaces; and

WHEREAS, MCB Hawaii will be conducting public outreach for this Undertaking through the NEPA process and associated environmental assessment.

NOW, THEREFORE, MCB Hawaii, the SHPO, and the ACHP agree that MCB Hawaii shall ensure that the following stipulations are implemented in order to take into account the effects of the Undertaking on historic properties.

STIPULATIONS

MCB Hawaii shall implement the following stipulations:

I. PROFESSIONAL QUALIFICATIONS

A. If any archaeological tasks are required during implementation of the Undertaking, all work pertaining to the identification and treatment of archaeological resources, including sites and objects, will be carried out by, or under the direct supervision of, a person or persons meeting the professional qualification for archaeology as found in "The Secretary of the Interior (SOI) Historic Preservation Professional Qualification Standards" (SOI Qualification Standards), per Federal Register, Vol. 62, No. 119, page 33712, June 1997, hereinafter noted as Qualified Archaeologist.

B. A Historical Architect (hereinafter, MCB Hawaii Historical Architect), who shall be an individual not affiliated with the design or construction contract that meets the SOI Qualification Standards shall be a key member of the design team and shall approve designs and subsequent changes to ensure adherence to design guidelines.

C. An SOI qualified Historical Landscape Architect is required to oversee and develop the Historic Landscape Study.

D. This will be a Design Bid Build procurement with two separate contract actions. One design contract and team, and another construction contract and team. Both shall have a SOI qualified Historical Architect to provide technical advice and oversight. A Design and Construction Team Historical Architect will be required under the design and construction contracts and shall ensure that work on Building 1 Complex meets the Secretary of the Interior's Standards for Rehabilitation. In addition, all functional analysis concept design (FACD), design, and construction work on a historic buildings will be developed with review, input, and approval from the Design and Construction Team Historic Architects in coordination with MCB Hawaii's Cultural Resource Managers (CRM).

1. In consultation with the MCB Hawaii CRM, the Design Team Historical Architect shall document a brief record of project decisions and concurrence

of project conformance with the Secretary of the Interior's Standards for Rehabilitation at each of the following key design stages: conceptual phase, 35%, 65% and 100%. This record will be made available for Signatories and Concurring Parties.

2. MCB Hawaii CRM and the Construction Team Historical Architect shall assure the restoration work complies with the Secretary of Interior Standards and the rehabilitation work and the construction of the Annex will comply with stipulations here within.
3. MCB Hawaii shall keep project records and concurrence as part of the NHPA consultation record and shall make this documentation available to consulting parties upon request.

II. DESIGN GUIDELINES

A. Design Guidelines for New Construction

1. MCB Hawaii shall construct a new three/four-story annex, hereafter referred to as the "Annex", adjacent and connected to the Building 1 Complex.
   a. The "Annex" shall be designed and constructed substantially in the form and location as the conception design exhibit in Appendix C. The design shall provide for the integration of historic character defining features through sensitive selection of architectural detailing and compatible material selection.
   b. The design of the Annex shall be sensitive to and compatible with the adjoining Building 1 Complex in terms of scale, massing, and exterior materials while remaining similar in character but distinct as new construction from the historic architecture.
   c. The Annex's building height shall not exceed four stories to minimize the visual impact to the Building 1 Complex and adjacent NRHP eligible Building 20.
   d. The configuration of the Annex shall be designed to minimize its visual impact to the Building 1 Complex, provide adequate vehicular and pedestrian access, and the least obtrusive footprint.
   e. The Annex's exterior architectural design shall be consistent with the existing Building 1 Complex exterior elevations to minimize visual impact to the historic buildings.
   f. Site plan design stipulations shall be based on the Historic Landscape Study (HLS) per Stipulation IIIA. Site plan design shall include location of entries, parking, open space and landscaping at conceptual level of detail. The annex shall be located to the north of the historic Building 1 Complex and shall not enclose or encroach on the east, south or west setback areas (see Stipulation II B.1. (e) – (f)) or facades. The Annex may be connected to the north façade, provided that any physical connections minimize demolition, new openings or other harm to historic fabric of the Building 1 Complex.

g. Exterior Doors: Doors in the Annex shall retain the scale and proportion of the original historic doors in the Building 1 Complex, including maintaining similar door and hardware profiles.
h. Windows: Windows in the Annex shall match the architectural detailing, scale and proportion of the existing historic windows in the Building 1 Complex in terms of the original window type, color and transparency of glass, and glazing pattern. The placement of new windows shall be consistent and compatible with the existing window pattern of the Building 1 Complex. Color selection for the new Annex shall match the Building 1 Complex but some distinction between the NRHP-eligible facility and the Annex is required whether by a "joint", material, color or texture.

2. Parking at Camp Smith
   a. Parking is a problem for all tenant commands at Camp Smith. A parking study is required to fully understand the need and deficiency by all tenants, and to set the requirements for designing a solution. In accordance with Stipulation III.A.4.ii below, the HLS' recommendations regarding parking will be incorporated into the parking study.
   b. Parking structure(s) is restricted to the north of the Annex and shall not be located in the open space buffer area adjacent to the Building 1 Complex (see Appendix C site plan) and as noted in Stipulation II.B.1.e and f. Any parking structure shall be no higher than the roof line of the Annex and not to exceed the allowable height requirement by 15% without concurrence by the consulting parties. Design of the parking structure shall be subject to the same design standards and review process as the Annex (see Stipulation II.A for the Annex and II.B. f for location of interim parking).
   c. Parking study results will be presented to consulting parties during the annual status meeting noted in Stipulation VI.C.

B. <u>Rehabilitation of NRHP Eligible Buildings (Buildings 1, 1A, 1B, 2D, 3A, and 80)</u>

1. MCB Hawaii shall ensure that all work on Buildings 1, 1A, 1B, 2D, 3A shall be designed and executed in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties with guidelines for preserving, rehabilitating, restoring and reconstructing historic buildings.
   a) The Building 1 Complex shall maintain overall massing, with simple rectilinear building shapes (e.g. previous wards) connected by windowed corridors (Buildings 1A and 1B); and a porte cochere at the entry. The porte cochere shall maintain a flat concrete roofline and massing of support columns. On the Building 1 Complex and visible above the port cochere, the vertical pilaster's size and pilaster rhythm shall be maintained. The Building 1 Complex roof shall remain flat and retain a flat concrete overhang at each floor, and retain smooth concrete surfaces on the exterior. Buildings 2D and 3A shall maintain semi enclosed concrete stairwells and distinct sunrooms on the south end of each ward.

b) Building 1 Complex's Exterior Doors: All exterior doors and appurtenances shall conform to Secretary of Interior's Standards and historic preservation guidelines, and applicable anti-terrorism/force protection (AT/FP) design criteria with intent to maintain the historic character of the WWII hospital.
c) Building 1 Complex's Windows: All exterior window systems and appurtenances shall conform to historic preservation guidelines and applicable AT/FP design criteria with intent to maintain the historic character of the WWII hospital. Rhythm of window openings and fenestration style and material shall be maintained and retained.
d) The Building 1 Complex shall be painted to match the original color scheme of the Building 1 Complex and future repainting shall follow the paint color selection guidelines according to the Camp Smith Installation Appearance Plan (IAP).
e) The open area created by the demolition of historic buildings, 3AA and 3B shall be developed as an open space buffer between the historic wing (Building 3A) and future development at Camp Smith. The open area created by the demolition of historic Building 2AA and 2C shall be developed and maintained as an open space buffer between the historic wing (Building 2D) and future development at Camp Smith. The site plan shall include landscaping, ground cover, perimeter trees and other finishes to provide a view shed to the remaining historic buildings. The open space may be used as a parade ground, park or passive recreational amenity.
f) The open area created by the demolition of historic Building 2C may be used as surface parking until a parking structure is built at the location described in II.A.2.b above, at which time the open area at Building 2C will be reclaimed as open space per Stipulation II.B.1.e. The main entry to Building Complex 1 (i.e. south elevation) shall retain the port cochere and formal entry. Parking and hardscape surfaces shall remain unchanged based on original site plan of historic hospital.

2. MCB Hawaii shall ensure that most of the extant Cold War character-defining features of Building 80 shall be preserved. This building is a monolithic, windowless, freestanding, concrete bomb-proof building. Building 80 will become an integral part of the Annex and will no longer be a freestanding building. To mitigate the loss of this significant character defining feature, MCB Hawaii will implement the following:
   a) Building 80 shall be preserved in place and although it will become an integral part of the Annex, the design shall distinguish the difference between the new Annex and Building 80, e.g. color, expansion, design layout, etc. .
   b) Building 80's other character-defining features shall be identified and maintained.

c) Design shall include a design demarcation/s between this Building 80 and the new Annex in remembrance of this freestanding historic structure.

C. Design Review Process
1. Each phase of the Undertaking shall comply with the Design Review Process described herein.
2. Design Team Historical Architect shall coordinate work with MCB Hawaii's CRM or Historical Architect at key design stages: conceptual, 35%, 65% and 100%. The scope of work shall include but not be limited to review packages containing plans, sections, elevations, colors, and materials. The Design and Construction Team Historical Architect/s shall document project design and construction decisions to ensure conformance to the Secretary of the Interior's Standards for Rehabilitation for the NRHP eligible buildings and compatible and harmonious design of the new construction as it relates to the historic properties, and, provide summary documents at key design stages for review and approval to the MCB Hawaii's Historical Architect/Base CRM.
3. MCB Hawaii shall provide the opportunity for the Signatories and Concurring Parties to this MOA to review project designs at conceptual design, 35%, 65%, and 100%, specific to the above design guidelines. MCB Hawaii shall provide review packages containing plans, sections, elevations, colors, and materials. Reviewing parties shall have thirty (30) calendar days from receipt of the packages to provide comments to MCB Hawaii. If requested by the Signatories or Concurring Parties, a teleconference or meeting will be organized and convened by MCB Hawaii to review the drawings. MCB Hawaii shall take into account all timely comments provided by the Signatories and Concurring Parties prior to finalizing the design. If comments include objections and are received within 30 days, ACHP will be included via teleconference to assist in an amicable resolution. If the dispute cannot be resolved, MCB Hawaii shall follow Stipulation VIII. If Signatories and Concurring Parties do not respond in writing to MCB Hawaii within 30 days after receipt of the package, MCB Hawaii may proceed with the design.
4. All design modifications and/or improvements to the historic buildings proposed by the Design and Construction Team Historical Architect shall be reviewed, coordinated, approved by the MCB Hawaii CRM or MCB Hawaii's Historical Architect and documented, to ensure the design and construction is reviewed and exceeds or meets the criteria specified under this MOA by the Signatories and Concurring Parties.

III. PRESERVING LANDSCAPES

A. Within one year of the execution of this MOA, MCB Hawaii shall complete a historic landscape study (HLS) of Camp Smith installation by a SOI qualified historic landscape architect per Stipulation I. The HLS, including implementation

of the preservation recommendations identified therein shall be mitigation for the demolition of the two wings and will be developed in accordance with the "National Park Service Guide to Cultural Landscape Reports" and also the "Secretary of Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Historic Landscapes".

1. HLS shall include review of archival maps and plans depicting its original design and any changes over time, landscape survey and documentation of contributing features, landscape analysis and evaluation, and landscape recommendations shall address immediate mission requirements for future expansion.
2. The HLS shall document potential design options for new buildable areas that will not affect the historic landscape or view planes, including the potential for closure of roads/road segments in this area to increase useable construction space.
3. Historic landscape preservation recommendations shall be developed in consultation with the Signatories and Concurring Parties during the HLS development. Should the Signatories and Concurring Parties disagree with MCB Hawaii regarding the preservation recommendations, the Signatories and Concurring Parties will follow Stipulation VIII below.
4. HLS will collate and evaluate the historic resources and mission requirements, and develop preservation recommendations. MCB Hawaii shall incorporate the HLS preservation recommendations into the development of the Installation Appearance Plan (IAP) for Camp Smith, future parking study, and any future base Master Plan (MP) within 1 year of completion of the final HLS.
    i. i. The IAP is intended to enhance the image, character, and appearance of MCBH. It provides recommendations for the layout of activity centers, major thoroughfares, secondary streets, pedestrian, and bike paths, building design, massing, color schemes, and signage.
    ii. ii. The Parking Study will determine the current and future parking requirements, address Stipulation II. A.2, and will develop scenarios that incorporate these MOA stipulations and the HLS recommendations.
    iii. iii. The MP is a comprehensive plan that accommodates current and future mission requirements into a compelling vision with clear goals and measurable objectives.

B. Recommendations from the historic landscape study will be implemented for any future development proposed for the open space created from the demolition of historic buildings 3AA, 3B, 2AA and 2C. The open spaces may be used as a parade ground, park or passive recreational amenity. Any proposed future development other than these identified uses in this open space would be evaluated for its cumulative impact and considered an adverse effect to the historic buildings and landscape and require compliance with 36 CFR Part 800 as a separate undertaking.

C. The main entry to the Building Complex 1 (i.e. south elevation) shall retain the port cochere and formal entry. Parking and hardscape surfaces shall remain unchanged based on the original site plan of the historic hospital.

IV. DOCUMENTATION

A. MCB Hawaii shall ensure that prior to any construction and/or demolition, HABS photo documentation shall be completed for the Building 1 Complex and Buildings 80, 81, and 82. The HABS report shall be carried out by or under the direction of an architectural historian or historical architect who meets the professional qualifications for Architectural Historian or Historical Architect under the SOI Qualification Standards. MCB Hawaii shall provide digital and printed copies of the draft final HABS reports to any Signatory or Concurring Party upon request. MCB Hawaii will provide printed copies of the draft final HABS to National Park Service and SHPO for review after which, MCB Hawaii shall forward the final documentation to the National Park Service for approval and final distribution to the Library of Congress and State of Hawaii SHPO.
B. MCB Hawaii shall complete two HABS reports, one to document the WWII Hospital (Building 1 Complex) and the other to document the Cold War Buildings (Building 80, 81, and 82) and include:
    1. Current high resolution-digital or large format photographs of the principal exterior views of the property; and key interior view of extant features;
    2. Location map;
    3. Information on the date of construction and functions of the property; and
    4. Original plans that depict the hospital features and function.

V. SALVAGE

A. Prior to the conceptual design phase, the Design Team Historical Architect will conduct a survey of the buildings scheduled for demolition or rehabilitation and will coordinate with the MCB Hawaii Historical Architect/Base CRM to determine the suitability for reuse and salvage of significant historic elements of buildings to be demolished and/or rehabilitated. The Design Team Historical Architect shall document salvaged material and specify how material will be reused. The MCB Hawaii Historic Architect shall monitor the salvage to ensure proper protection of the historic fabric and minimize unnecessary damage.

VI. PROJECT EXECUTION

A. MCB Hawaii shall complete the following actions prior to any construction of this undertaking:

    1. HABS documentation described in Stipulation IV shall be completed prior to demolition and/or renovation of any NRHP eligible building.
    2. If historic components are identified, MCB Hawaii will designate storage for salvaged historic components prior to demolition and/or renovation.

B. No preemptive demolition. No demolition of historic buildings and structures should occur until construction funding is awarded.
C. MCB Hawaii CRM shall host an annual meeting for Signatories and Consulting Parties to include an agenda summarizing all prior year actions; review of the agenda items to be discussed during the meeting; and, a summary of meeting highlights to be provided thereafter. This annual meeting will be conducted once funds have been committed for this Undertaking and continued every year thereafter until the MOA is terminated or expires.
D. The HLS will be completed within one year of execution of the MOA.
E. This Undertaking shall implement HLS preservation recommendations during each design phase and throughout the construction phase.

VII. DISCOVERIES

A. HISTORIC PROPERTIES. If during the performance of the Undertaking, previously unidentified cultural resources are discovered within the APE, MCB Hawaii shall immediately stop all work in the vicinity and assess the NRHP eligibility of the properties.

1. If the discovery is determined to be eligible for the NRHP by MCB Hawaii and SHPO, then MCB Hawaii shall make reasonable efforts to avoid, minimize or mitigate adverse effects to such properties. MCB Hawaii shall notify the Signatories, Concurring Parties, and NHOs within 48 hours of the discovery by email, followed by written notification. The notification shall include a request for review and comment on the assessment of the property's NRHP eligibility and MCB Hawaii's proposed actions to resolve any potential adverse effects.

2. If the MCB Hawaii CRM determines the discovery is ineligible for the NRHP, MCB Hawaii CRM shall notify the SHPO of this initial assessment and allow 48 hours for any comments. If the SHPO concurs that the discovery is not eligible for the NRHP, MCB Hawaii may authorize work to continue. If SHPO does not concur with the eligibility determination MCB Hawaii shall consult further with the SHPO to resolve the dispute.

3. If the Signatories, Concurring Parties, and NHOs do not respond within 5 business days of the email and written notification of the discovery, then MCB Hawaii may move forward with its proposed actions to resolve any adverse effects to historic properties. Any requests for access to the area of the discovery shall be subject to reasonable requirements for identification, escorts (if necessary), safety, and other administrative and security procedures.

4. MCB Hawaii shall take into account any timely comments received from Signatories, Concurring Parties, and NHOs if applicable regarding the

NRHP eligibility of discovered cultural resources and any proposed actions to resolve adverse effects to historic properties. Should such actions include archaeological efforts, such action shall be carried out by or under direct supervision of a person or persons meeting the SOI Qualification Standards for a Qualified Archaeologist. MCB Hawaii shall provide the Signatories and Concurring Parties and any interested party that has requested to be notified with a report of the action/s within 60 days of completion date.

B. DISCOVERY OF CULTURAL ITEMS. If during the performance of the Undertaking, previously unidentified cultural resources are discovered within the APE and are determined to be cultural items as defined in the Native American Graves Protection and Repatriation Act ("NAGPRA") (25 U.S.C. 3001 et seq., as appropriate) and its respective regulations, the procedures below will be followed.

1. Treatment and Consultation. MCB Hawaii shall consult with culturally affiliated claimants regarding the appropriate treatment and disposition of those Cultural Items in accordance with NAGPRA and its respective regulations.

2. Notification. If human remains, associated and unassociated funerary objects, sacred objects, and objects of cultural patrimony (Cultural Items) are discovered within the APE by any action taken pursuant to this MOA, the MCB Hawaii shall immediately stop all ground-disturbing activities in the vicinity, barricade, stabilize, and protect the discovery from continuing ground disturbance in the immediate area of the Cultural Items and in the surrounding area to the extent further subsurface resources may reasonably be expected to be present, and shall notify the appropriate culturally affiliated claimant(s).

VIII. RESOLVING OBJECTIONS

A. Should a Signatory or Concurring Party to this MOA object in writing to MCB Hawaii regarding how the proposed Undertaking is carried out or the manner in which the terms of this MOA are carried out, MCB Hawaii shall consult with the objecting party to resolve the objection. If MCB Hawaii determines that the objection cannot be resolved, MCB Hawaii shall forward all documentation relevant to the dispute to the ACHP, including MCB Hawaii's proposed response to the objection. Within 30 days after receipt of all pertinent documentation, the ACHP will:

1. Advise MCB Hawaii that it concurs with MCB Hawaii's proposed response, whereupon MCB Hawaii shall respond to the objection accordingly; or

2. Provide MCB Hawaii with recommendations pursuant to 36 CFR § 800.2(b)(2), which MCB Hawaii shall take into account in reaching a final decision regarding the dispute; or

3. Notify MCB Hawaii that it shall comment pursuant to 36 CFR § 800.7(c) and proceed to comment on the subject in dispute.

B. Should the ACHP not exercise one of the above options within 30 days after receipt of all pertinent documentation, MCB Hawaii may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, MCB Hawaii shall prepare a written response that takes into account any timely comments regarding the dispute from the Signatories and Concurring Parties to the MOA, and provide them and the ACHP with a copy of such written response.

C. MCB Hawaii's responsibility to carry out all actions under this MOA that are not the subject of the objection shall remain unchanged.

IX. AMENDMENT AND TERMINATION

Signatories (SHPO, MCB Hawaii, and ACHP) may propose to amend or terminate this MOA. Upon a proposal to amend this MOA, MCB Hawaii shall initiate consultation to consider such an amendment and shall notify consulting parties. This MOA may be amended when such an amendment is agreed to in writing by all Signatories. The amendment shall be effective on the date a copy signed by all of the Signatories is filed with the ACHP.

If any Signatory to this MOA determines that its terms will not, or cannot be carried out, that party shall immediately consult with the other parties to attempt to develop an amendment. If within 30 days (or another time period agreed to by all Signatories) an amendment cannot be reached, any Signatory may terminate the MOA upon written notification to the other Signatories.

Once the MOA is terminated, and prior to work continuing on the undertaking, MCB Hawaii must either (a) execute a new MOA pursuant to 36 CFR § 800.6 or (b) request, take into account, and respond to the comments of the ACHP under 36 CFR § 800.7. MCB Hawaii shall notify the Signatories and consulting parties as to the course of action it will pursue.

X. DURATION

This MOA shall expire 15 years from the date of its execution, or if terminated pursuant to Stipulation IX. MCB Hawaii shall provide annual updates (written or via meeting) in accordance with Stipulation VI.C. to Signatories and Concurring Parties until the MOA has expired or has been terminated.

XI. ANTI-DEFICIENCY.

The MCB Hawaii's obligations under this MOA are subject to the availability of appropriated funds, and the stipulations of this MOA are subject to the provisions of the Anti-Deficiency Act. MCB Hawaii shall make reasonable and good faith efforts to secure the necessary funds to implement this MOA in its entirety. If compliance with the Anti-Deficiency Act alters or impairs the MCB Hawaii's ability to implement the stipulations of this agreement, MCB Hawaii shall consult in accordance with the amendment and termination procedures found at Stipulation IX of this MOA.

Execution of this MOA by the MCB Hawaii, the SHPO, and the ACHP, and implementation of its terms evidence that MCB Hawaii has taken into account the effects of this Undertaking on historic properties and afforded the ACHP an opportunity to comment.

SIGNATORIES:

MARINE CORPS BASE HAWAII, KANEOHE

By: _____ Date: 6 FEB 2015

E. W. Schaefer
Colonel, U. S. Marine Corps
Commanding Officer, MCB Hawaii

STATE HISTORIC PRESERVATION OFFICER

By: _____ Date: 3.12.15

Dr. Alan S. Downer
Deputy Hawaii State Historic Preservation Officer
Department of Land and Natural Resources

ADVISORY COUNCIL ON HISTORIC PRESERVATION

By: for _____ Date: 4/24/15

John M. Fowler
Executive Director

CONCURRING PARTIES:

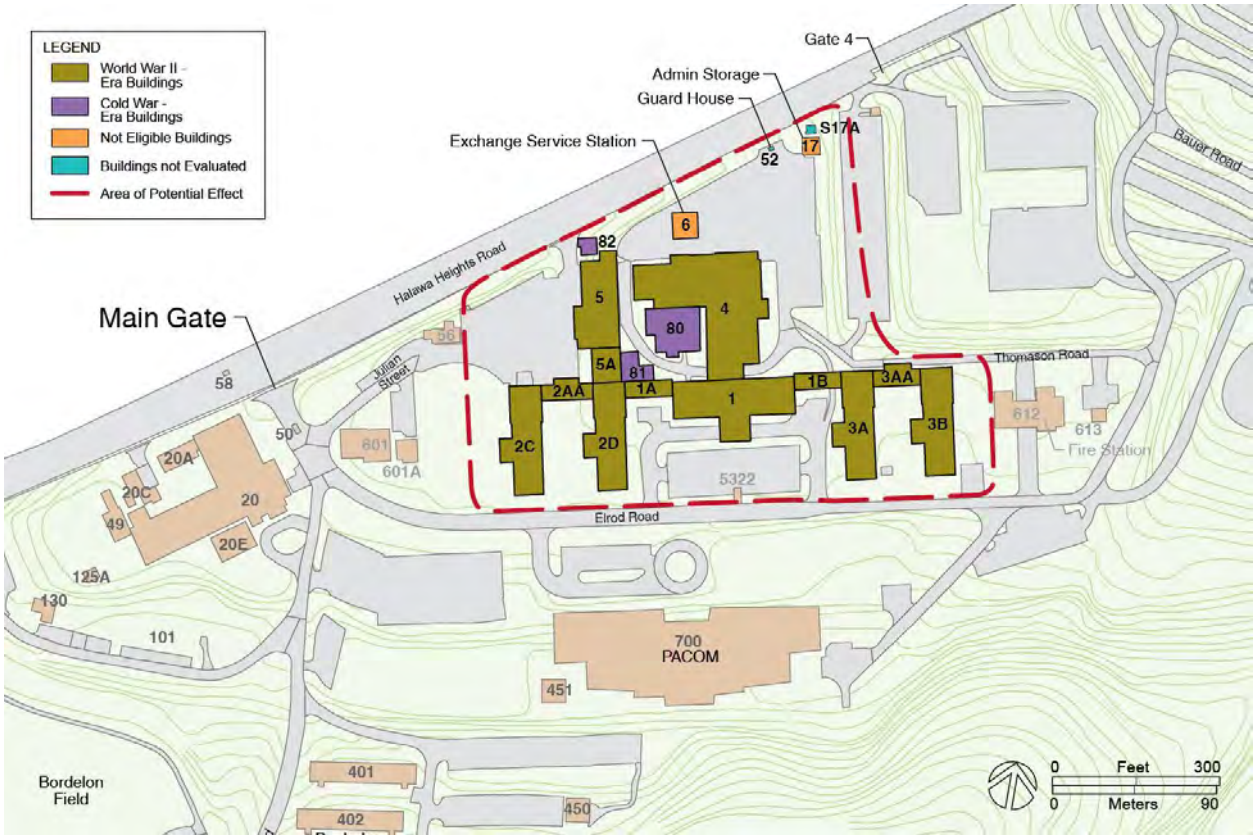
NATIONAL TRUST FOR HISTORIC PRESERVATION

By: _____ Date: _____
Elizabeth S. Merritt
Deputy General Counsel

HISTORIC HAWAII FOUNDATION

By: Kiersten Faulkner Date: Mar. 6, 2015
Kiersten Faulkner
Executive Director

APPENDIX A
Area of Potential Effect

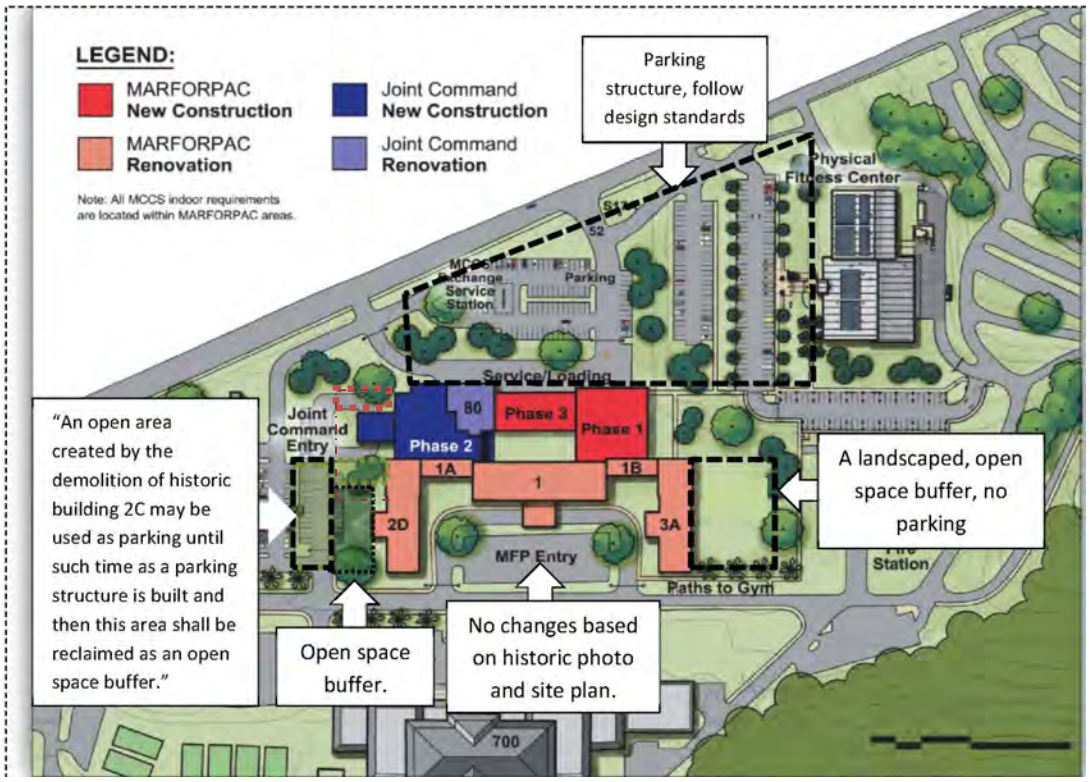


APPENDIX B
Summary of Actions for
The Consolidated Facility for Marine Corps Forces Pacific and Joint Command Complex

BUILDING 1 COMPLEX, CAMP SMITH, HAWAII

Facility No	NRHP Eligibility	Criteria for Eligibility	Under-taking Action
1	E	A &C	Rehab
1A	E	A &C	Rehab
1B	E	A &C	Rehab
2AA	E	A &C	Demo
2C	E	A &C	Demo
2D	E	A &C	Rehab
3A	E	A &C	Rehab
3AA	E	A &C	Demo
3B	E	A	Demo
4	E	A	Demo
5	E	A	Demo
5A	E	A	Demo
6	NE		Demo
17	NE		Demo
80	E	A &C	Rehab
81	E	A &C	Demo
82	NE	A &C	Demo

APPENDIX C


LEGEND:
MARFORPAC New Construction
MARFORPAC Renovation
Joint Command New Construction
Joint Command Renovation
Note: All MCCS indoor requirements are located within MARFORPAC areas.
Parking structure, follow design standards
Physical Fitness Center
MCCS Exchange Service Station
Parking
Service/Loading
Joint Command Entry
80
Phase 3
Phase 1
Phase 2
1A
1
1B
2D
3A
MFP Entry
Paths to Gym
Fire Station
700
"An open area created by the demolition of historic building 2C may be used as parking until such time as a parking structure is built and then this area shall be reclaimed as an open space buffer."
A landscaped, open space buffer, no parking
Open space buffer.
No changes based on historic photo and site plan.

Appendix A-1

Continuing Section 106 Consultation Correspondence

UNITED STATES MARINE CORPS
MARINE CORPS BASE HAWAII
BOX 63002 KANEOHE BAY, HAWAII 96863-3002

IN REPLY REFER TO:
5090
LE/175-15

SEP 17 2015

Mr. John Fowler
Advisory Council on Historic Preservation
Office of Executive Director
401 F Street NW, Suite 308
Washington DC 20001-2637

SUBJECT: SECTION 106 CONTINUING CONSULTATION:
AGENCY FINDING OF PROPERTY AS NOT ELIGIBLE
CAMP H.M. SMITH BUILDING 1 COMPLEX CONSOLIDATION & RENOVATION PROJECT, MARINE CORPS BASE HAWAII, DISTRICT OF EWA, AHUPUAA OF HALAWA, ON THE ISLAND OF O'AHU, TMK 1-9-9-010:007.

Dear Mr. Fowler:

Marine Corps Base (MCB) Hawaii is continuing consultation regarding stipulations in the *Memorandum of Agreement (MOA) Among Marine Corps Base (MCB) Hawaii, the Hawaii State Historic Preservation Officer (SHPO), and the Advisory Council On Historic Preservation (ACHP) Regarding the Proposed Consolidated And Adjoining Facility for Marine Corps Forces Pacific Operations And Joint Command Complex, Marine Corps Base Hawaii Camp Smith,* that was executed in April 2015. Pursuant to Stipulation III of this MOA, MCB Hawaii has executed a historic landscape survey of the Camp Smith installation, from which the Draft Historic Landscape Report (HLR) has been distributed for review by the MOA Signatories and concurring parties. Stipulation III also requires the HLR to include the development of treatment recommendations for preserving historic landscape features that shall be implemented into future MCB Hawaii Installation Appearance (IAP) and Master Plans (MP). The MOA, however, failed to address any results of the analysis and eligibility evaluation of the historic landscape.

As you are aware, results of the Draft HLR (iteration dated April 2015) regarding analysis and evaluation of the Camp Smith historic landscape features include the following findings, "…some elements and areas of Camp Smith's landscape are historically significant for their associations with and contributions to the Aiea Heights Naval Hospital (AHNH) campus, an important U.S. Naval medical facility during World War II, under [National Register] Criteria A and C" (AECOM 2015, 4-9). The Draft HLR findings further state that a "…portion of the landscape can be considered eligible for the National Register as a contributing site that would be part of a potential district primarily composed of the hospital buildings that have been determined eligible…" (ibid. 4-9).

Identification of Historic Property

The April 2015 MOA states that, "…throughout this agreement, Buildings 1, 1A, 1B, 2C, 2AA, 2D, 3A, 3AA, 3B, 4, 5, and 5A are collectively designated as the 'Building 1 Complex'"; these buildings were determined individually eligible for listing in the National Register of Historic Places (NRHP) in 2014. Although the Draft HLR refers to "a potential historic district", it also documents in several places how the "…character of the former Aiea

Heights Naval Hospital campus landscape at Camp Smith has changed over time with the removal of temporary wartime features, the major functional change of the installation's mission from a hospital to an administrative headquarters, and the addition of modern facilities to support the Fleet Marine Forces Pacific (FMFPAC) and the United States Pacific Command (USPACOM)" (AECOM 2015, 4-10) headquarters. Indeed, the characteristics most notably altered include the large number of the buildings and structures that stood at the AHNH during its period of significance which are no longer present and the many alterations made to the buildings that remain, the missing spatial features from the hospital period (e.g. warehouses, mess hall wards, truck garden, and temporary buildings on what is now Bordelon Field; and temporary hospital ward cluster on terraces north and northeast of the Building 1 Complex, among others), and missing circulation features including walks and parking areas serving former Nurses' Quarters, BOQs, and Corpsmen's Quarters along Elrod Road.

Additionally, the Draft HLR notes that while some limited areas retain a few character-defining features associated with the hospital's significance, integrity is diminished across the entire landscape. Thus, due to the major changes that have occurred over time at Camp Smith combined with the diminished historic integrity of the overall landscape, MCB Hawaii has determined that the Camp Smith Building 1 Complex is not eligible for listing in the NRHP as a historic district.

Determination of Effect

In summary, MCB Hawaii previously determined through the MOA mentioned above, and pursuant to 36 CFR §800.5(a)(1), that the Undertaking, which will demolish Buildings 2AA, 2C, 3AA, 3B, 4, 5, 5A, 6, 17, 81, and 82 to construct a consolidated and secured adjoining facility and, rehabilitate Buildings 1, 1A, 1B, 2D, 3A, and 80, will have an adverse effect on historic properties. Additionally, MCB Hawaii agreed to implement various stipulations, including conducting a historic landscape survey of Camp Smith, as a way to mitigate the effects of the Undertaking on historic properties.

Although the results of the Draft HLR raised the issue of the Camp smith Building 1 Complex being a potential historic district, MCB Hawaii has determined that the Building 1 Complex is not eligible for listing in the NRHP as a historic district as noted above. Thus, in accordance with 36 CFR §800.4(d)(1), MCB Hawaii has determined that the Undertaking will result in no historic properties, i.e. district, affected because the Building 1 Complex lacks integrity as a historic district.

We request your review of and concurrence in the above historic property identification and effect determination within 30 days of receipt of this letter. As defined in 36 CFR §800.4(d)(1)(i), we will assume your concurrence if no objection is received from your office within 30 days of receipt of this letter. MCB Hawaii is simultaneously consulting with the Hawaii State Historic Preservation Officer (SHPO) and with Historic Hawaii Foundation, the one concurring party to the aforementioned MOA. Should you or your staff have any questions or concerns please contact the MCB Hawaii Cultural Resources Management staff, Ms. June Cleghorn at 257-7126 or via email at june.cleghorn@usmc.mil or Ms. Coral Rasmussen at 257-7134 or via email at coral.rasmussen@usmc.mil.

IN REPLY REFER TO:
5090
LE/175-15

Sincerely,

W. M. ROWLEY
Major, U. S. Marine Corps
Director, Environmental Compliance and Protection Department
By direction of the Commanding Officer

References:

AECOM
2015 *Camp H.M. Smith Historic Landscape Report, Draft*. Prepared for Marine Corps Base Hawaii, Kaneohe Bay, Hawaii. Contracted by Navy Facilities Engineering Command, Pacific, Pearl Harbor, Hawaii. AECOM in association with TEC Joint Venture, Inc., Honolulu.

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UNITED STATES MARINE CORPS
MARINE CORPS BASE HAWAII
BOX 63002 KANEOHE BAY, HAWAII 96863-3002

IN REPLY REFER TO:
5090
LE/156-15

SEP 17 2015

Dr. Alan Downer
Deputy State Historic Preservation Officer
Department of Land and Natural Resources
Kakuihewa Building, Room 555
601 Kamokila Boulevard
Kapolei, HI 96707

SUBJECT: SECTION 106 CONTINUING CONSULTATION:
AGENCY FINDING OF PROPERTY AS NOT ELIGIBLE
CAMP H.M. SMITH BUILDING 1 COMPLEX CONSOLIDATION & RENOVATION PROJECT, MARINE CORPS BASE HAWAII, DISTRICT OF EWA, AHUPUAA OF HALAWA, ON THE ISLAND OF O'AHU, TMK 1-9-9-010:007.

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also documents in several places how the "…character of the former Aiea Heights Naval Hospital campus landscape at Camp Smith has changed over time with the removal of temporary wartime features, the major functional change of the installation's mission from a hospital to an administrative headquarters, and the addition of modern facilities to support the Fleet Marine Forces Pacific (FMFPAC) and the United States Pacific Command (USPACOM)" (AECOM 2015, 4-10) headquarters. Indeed, the characteristics most notably altered include the large number of the buildings and structures that stood at the AHNH during its period of significance which are no longer present and the many alterations made to the buildings that remain, the missing spatial features from the hospital period (e.g. warehouses, mess hall wards, truck garden, and temporary buildings on what is now Bordelon Field; and temporary hospital ward cluster on terraces north and northeast of the Building 1 Complex, among others), and missing circulation features including walks and parking areas serving former Nurses' Quarters, BOQs, and Corpsmen's Quarters along Elrod Road.

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We request your review of and concurrence in the above historic property identification and effect determination within 30 days of receipt of this letter. As defined in 36 CFR §800. 4(d)(1)(i), we will assume your concurrence if no objection is received from your office within 30 days of receipt of this letter. MCB Hawaii is forwarding a copy of this letter to the MOA concurring party listed below as part of the Section 106 consultation process for this proposed undertaking. Thus, MCB Hawaii also requests comments from the concurring party regarding the aforementioned determinations within 30 days of receipt of this letter. Should you or your staff have any questions or concerns please contact the MCB Hawaii Cultural Resources Management staff, Ms. June Cleghorn at 257-7126 or via email at june.cleghorn@usmc.mil or Ms. Coral Rasmussen at 257-7134 or via email at coral.rasmussen@usmc.mil.

IN REPLY REFER TO:
5090
LE/156-15

Sincerely,

W. M. ROWLEY
Major, U. S. Marine Corps
Director, Environmental Compliance and Protection Department
By direction of the Commanding Officer

Copy to:

Ms. Kiersten Faulkner, Historic Hawaii Foundation

References:

AECOM
2015 *Camp H.M. Smith Historic Landscape Report, Draft.* Prepared for Marine Corps Base Hawaii, Kaneohe Bay, Hawaii. Contracted by Navy Facilities Engineering Command, Pacific, Pearl Harbor, Hawaii. AECOM in association with TEC Joint Venture, Inc., Honolulu.

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STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

STATE HISTORIC PRESERVATION DIVISION
KAKUHIHEWA BUILDING
601 KAMOKILA BLVD, STE 555

October 30, 2015

IN REPLY REFER TO:
LOG: 2015.03491
DOC: 1510AB22
"concur"

W.M. Rowley
Major, U.S. Marine Corps
Director, Environmental Compliance and Protection Department
United States Marine Corps
Marine Corps Base Hawaii
Box 63002 Kaneohe Bay, HI 96863-3002

RE: Section: Section 106 Cultural Resources Management
Agency: United States Marine Corps
Project Name: Camp H.M. Smith Building 1 Complex Consolidation & Renovation
Location: Camp Smith
TMK: (1) 9-9-010:007

Dear Major Rowley:

On September 17, 2015, the State Historic Preservation Division (SHPD) received a submittal from the United States Marine Corps for the Building 1 Complex Consolidation & Renovation at Camp Smith (TMK (1) 9-9-010:007).

Per Stipulation III of the *Memorandum of Agreement (MOA) Among Marine Corps Base (MCB) Hawaii, the Hawaii State Historic Preservation Officer (SHPO), and Advisory Council on Historic Preservation (ACHP) Regarding The Proposed Consolidated and Adjoining Facility for Marine Corps Forces Pacific Operations and Joint Command Complex, Marine Corps Base Hawaii Camp Smith* (MOA) SHPD reviewed the historic landscape survey of the Camp Smith installation and the SHPO concurs with the United States Marine Corps determination that the complex is not eligible for the National Register of Historic Places as a historic district. However, Buildings 1, 1A, 1B, 2C, 2AA, 2D, 3A, 3AA, 80, 81, and 82 are individually eligible for the National Register of Historic Places as stated in the MOA.

The opinion of the SHPO is based on the materials provided for our review. If you believe that there is material that we should consider that might affect our finding, or if you have questions, please contact Anna Broverman, Architectural Historian, at (808) 692-8028 or by email at anna.e.broverman@hawaii.gov. **Please reference our project number in all communication with this office regarding this undertaking.**

The United States Marine Corps is the office of record for this undertaking . Please maintain a copy of this letter with your environmental review record for this undertaking. If you have any questions about this undertaking or if there is a change to the scope of work, please contact Anna Broverman, Architectural Historian, at (808) 692-8028 or by email at anna.e.broverman@hawaii.gov.

(Continued on Reverse)

Mahalo,

Dr. Alan Downer
Deputy State Historic Preservation Officer

CC: Kiersten Faulkner, Executive Director
Historic Hawaii Foundation
kiersten@historichawaii.org

Appendix B

CZMA Notification of *De Minimis* Determination

-----Original Message-----
From: Nakagawa, John D [mailto:john.d.nakagawa@hawaii.gov]
Sent: Thursday, March 03, 2016 1:34 PM
To: Bigay, John CIV NAVFAC PAC, EV2
Subject: [Non-DoD Source] RE: CZM DEMINIMIS

DETERMINATION CZM De Minimis determination notification

received.

Thank you.

John Nakagawa
Hawaii Coastal Zone Management (CZM) Program
Email: john.d.nakagawa@hawaii.gov
Phone: (808) 587-2878

-----0riginaI Message-----
From: Bigay, John CIV NAVFAC PAC, EV2 [mailto:john.bigay@navy.mil]
Sent: Thursday, March 03, 2016 1:27PM
To: Nakagawa, John D <john.d.nakagawa@hawaii.gov>
Subject: CZM DEMINIMIS DETERMINATION

Aloha, John!

We have been working on an EA for renovation of the old Naval Hospital complex at Camp Smith, Aiea - known as the Building 1Complex. The proposed project will involve some demolition, some construction, and some renovation, all within the boundaries of the existing complex, with heights of new structures being limited to that of the existing complex. We have completed consultation under NHPA Sec 106, with the result being a Memorandum of agreement among the SHPO and consulting parties regarding the project as a whole and treatment of renovation/construction. There are no significant environmental impacts identified. The project is anticipated to take up to 10 years to complete (it will be in phases, so as not to disrupt current activities and to allow for "swing space").

Our determination is that the proposed action falls under de minimis items 1(New Construction), and 11(Demolition). We have an in-house draft EA and draft FONSI, if you wish to see them. We are anticipating preparing these for a 30-day public review shortly.

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