

FINDING OF NO SIGNIFICANT IMPACT FOR MOKAPU ELEMENTARY SCHOOL CAMPUS IMPROVEMENTS AT MARINE CORPS BASE KANEOHE BAY, OAHU, HAWAII

DEPARTMENT OF THE NAVY
United States Marine Corps

FINDING OF NO SIGNIFICANT IMPACT (FONSI) FOR MOKAPU ELEMENTARY SCHOOL CAMPUS IMPROVEMENTS MARINE CORPS BASE KANEOHE BAY, OAHU, HAWAII

Pursuant to the Council on Environmental Quality Regulations (40 Code of Federal Regulations [CFR] Parts 1500-1508) implementing the procedural provisions of the National Environmental Policy Act (NEPA) (42 USC 4321 et seq.), Environmental Compliance and Protection Manual, Chapter 12, Marine Corps Order P5090.2 CH 3 of 26 August 2013, and U.S. Marine Corps (USMC) NEPA Manual (Version 2 of September 2011), the USMC gives notice that an Environmental Assessment (EA) has been prepared for the proposed Mokapu Elementary School Campus Improvements at Marine Corps Base Kaneohe Bay, Oahu, Hawaii. Based on the EA, the Proposed Action was determined to not result in significant impacts to the human or natural environment; therefore, an Environmental Impact Statement (EIS) is not required.

Proposed Action:

The State of Hawai'i Department of Education (HIDOE) proposes to construct campus improvements at Mokapu Elementary School (ES), located on a 14-acre site owned by the federal government at Marine Corps Base Hawaii (MCBH) Kaneohe Bay. The action would essentially replace or upgrade the existing school with a modern equivalent school on the same site that would meet 21st century design and technology standards. Construction is planned to commence in 2022, with the first phase completed by the start of the 2024-2025 school year, with completion expected in 2027. The Proposed Action would include 2- and 3-story classroom buildings, cafeteria, covered playcourt, administration, playfield, parking facilities, and on- and off-site infrastructure improvements and utility connections.

Purpose and Need:

The purpose of the Proposed Action is to provide public school facilities that meet current and projected functional and space requirements and offer a supportive learning environment for pre-kindergarten through sixth grade students at MCBH Kaneohe Bay. The Proposed Action is needed to remedy existing over-capacity conditions and facility deficiencies at Mokapu ES, accommodate its projected enrollment, and provide infrastructure capacity to meet modern technology and climate control requirements.

Alternatives Analyzed: Alternatives were developed for analysis based upon the following reasonable alternative screening factors: meets the purpose and need for the Proposed Action, meets physical siting, functional relationship, and space requirements established by HIDOE to serve a design enrollment population of 975 students; phasing feasibility; minimizes disruption to school operations, Mokapu ES students and their families, and the learning environment; provides safe and efficient motor vehicle, bicycle, and pedestrian traffic flow to and from campus; physical orientation to surrounding community; minimizes costs; and complies with MCBH Kaneohe Bay's land use plan. Based on the reasonable alternative screening factors and meeting the purpose and need for the Proposed Action, the No Action Alternative and two action alternatives were carried forward for detailed analysis in the EA.

No Action Alternative: Under the No Action Alternative, the Proposed Action would not occur and Mokapu ES would continue to operate in facilities that do not meet current and projected HIDOE functional and space requirements (i.e., would not meet the project purpose). The No Action Alternative would cause HIDOE to forego available federal grant funding to support a 21st century learning environment for the children of active duty DoD personnel. Classrooms would remain undersized and instruction would continue to utilize temporary (portable) structures that do not provide an optimal environment for student achievement.

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Alternative 1 (Preferred Alternative): This alternative would replace all existing Mokapu ES facilities with approximately 162,000 square feet (sq ft) of floor area in new facilities that meet current and projected facility requirements for a design enrollment of 975 students. The conceptual plan envisions five new permanent buildings would be constructed (this number could change in the design process) in the north half of the site. The new facilities would be located primarily over the existing playfield and partially over the footprint of existing school facilities. The new buildings would include two classroom buildings (one 2-story building and one 3-story building) with 56 classrooms, an administration/library/media center, cafeteria, and covered play court. The existing 16 permanent school buildings (including library, cafeteria, and administration buildings) and 10 temporary buildings would be demolished, and a large playfield, driveway, and expanded surface parking would be established in their place at the south end of the site along the Mōkapu Road frontage. Construction activities would occur in two major phases between 2022 and 2027.

Alternative 2: This alternative would construct approximately the same floor area as the Preferred Alternative, although in a different configuration and by partially reusing existing facilities. In this alternative, five existing buildings and would be retained and renovated. Of these, only the two most recently-constructed buildings with larger classrooms would remain as classroom space, while additions to the other three would be constructed. Four new classroom buildings, a cafeteria, and covered playcourt would also be constructed. This alternative would result in an overall building footprint about 10,000 GSF larger than the Preferred Alternative because the retained facilities are one-story buildings. The school must remain operational throughout project implementation, thus construction and renovation activities in this alternative would take place in close proximity to actively-used classrooms. This alternative is estimated to take between eight and ten years to complete in six construction phases (i.e., at least three years longer than Alternative 1). Because of its extended construction timeline and likely disruption to school operations and the learning environment, it is not the HIDOE's preferred alternative.

Alternatives Considered but Dismissed from Further Consideration: The following alternatives were considered, but not carried forward for detailed analysis in this EA because they do not meet the purpose and need for the project and satisfy the reasonable alternative screening factors:

- Alternative sites within MCBH Kaneohe Bay and the civilian community
- Alternative schools in the civilian community
- Greater building density

Environmental Effects:

No significant direct, indirect, or cumulative environmental impacts would occur from implementing the Proposed Action. Because their potential impacts were considered negligible or nonexistent, the following resources were not evaluated in detail in this EA: land use, visual resources, airspace, noise, infrastructure, socioeconomics, and environmental justice. Potential environmental impacts on air quality, geological resources, water resources, cultural resources, biological resources, transportation, natural hazards, public health and safety, and hazardous materials and wastes are summarized here.

Air Quality: The Proposed Action would result in insignificant air quality impacts in the construction and operational periods. Because the State of Hawaii is in attainment of the National Ambient Air Quality Standards, the Proposed Action is not subject to the Clean Air Act's General Conformity Rule. Greenhouse gas emissions during the construction and operational periods were estimated to be well below the CEQ's threshold of 25,000 metric tons of carbon dioxide equivalent per year.

Geological Resources: The Proposed Action would result in insignificant impacts to geological resources in the construction and operational period. There would be ground disturbance during foundation preparation, demolition of existing facilities, and construction of a new drainage swale. During operations, no further ground disturbance is anticipated. No significant geological features would be altered by construction or operation of this alternative.

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Construction period best management practices (BMPs) and conditions of the project's National Pollutant Discharge Elimination System (NPDES) permit would avoid or reduce the potential for soil erosion and subsequent offsite transport of sediments. Operation of the new school facilities is not expected to increase soil erosion or stormwater runoff, or have other impacts to geological resources.

Water Resources: The Proposed Action would result in insignificant impacts to water resources. No project components are proposed to be constructed in jurisdictional waters of the U.S. (e.g., streams, rivers, wetlands). During project construction may generate soil erosion, sedimentation, and transport of pollutants that could reach the MCDC and downstream surface waters; however, the use of construction BMPs would avoid or minimize potential impacts by preventing or reducing construction-related sediments and pollutants from being transported offsite to sensitive surface water and marine resources. During the operational period, there would be no net increase in off-site runoff or increase in flood elevation from existing conditions. The project's low impact development features would reduce offsite stormwater flows and potential associated water quality impacts. The Proposed Action will complete the requirements of Presidential Executive Order (EO) 11988 Floodplain Management prior to implementation.

Cultural Resources: The Proposed Action would result in less than significant construction or operational period impacts to cultural resources. No archaeological deposits or human skeletal remains were encountered during subsurface testing conducted for the Proposed Action and it is unlikely that they would be encountered during project activities. No traditional cultural properties have been identified in or near the project area and none are expected to be impacted by the Preferred Alternative. The Preferred Alternative would not impact traditional Hawaiian, or other ethnic group's, rights related to gathering, access, or other customary activities exercised for subsistence, cultural and religious purposes because construction activities. An architectural inventory survey and evaluation was conducted for 28 Mokapu ES facilities that would be affected by the Proposed Action. Twenty Mokapu ES buildings built between 1960 and 1970 were evaluated as eligible for the Hawaii State and National Registers of Historic Places and eight buildings constructed after circa 1970 were evaluated as not eligible.

In accordance with Section 106 of the National Historic Preservation Act (NHPA), MCBH consulted with the Hawaii State Historic Preservation Officer (SHPO), Oahu Island Burial Council, Office of Hawaiian Affairs, National Trust for Historic Preservation, Historic Hawaii Foundation, Boyd Ohana, Diamond Ohana, Kekoolani Ohana, Keohokalole Ohana, Koolauloa Hawaiian Civic Club, Paik Ohana, Paoa/Kea/Lono Ohana, Prince Kuhio Hawaiian Civic Club, Van Horn Diamond/Olds Ohana, and Temple of Lono regarding the undertaking and the details of the Preferred Alternative. MCBH determined that the Preferred Alternative would result in an adverse effect on historic properties in accordance with the Section 106 Implementing Regulations based on the demolition of buildings that are eligible for the National Register of Historic Places (NRHP).

MCBH consulted with the consulting parties listed above in accordance with NRHP Section 106 Implementing Regulations at 36 CFR 800.6(a) to develop and evaluate alternatives or modifications to the undertaking that could avoid, minimize, or mitigate adverse effects on historic properties. MCBH also notified the Advisory Council on Historic Preservation of its adverse effect finding. A Memorandum of Agreement (MOA) Among Marine Corps Base Hawaii, Hawaii State Historic Preservation Officer, and Hawaii Department of Education Regarding Mokapu Elementary School Campus Improvements Aboard Marine Corps Base Hawaii was executed on April 18, 2022 (included in EA Appendix B). Appropriate offsetting mitigation for the adverse effect on historic properties was developed in consultation with the consulting parties to provide redress for the Proposed Action's anticipated adverse effects and are described in detail in the MOA. They include:

- Historic context booklet on Mokapu ES and its historical background and significance as a mid-century school, to include its character-defining features and discussion of the local and broader national context of finger plan schools. The booklet will be designed to make technical information on the school's historic context accessible to educators, elementary school students, and the general public, as described in the MOA. It will be made available to Mokapu ES and MCBH Kaneohe Bay for educational outreach, cultural resources education, and public outreach.

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- Inventory of finger plan public elementary schools in Hawaii
- Interpretive display of the school's historic context, including the historic relevance of the original school facilities. A wall-mounted display case will be installed in the entry lobby of the new school.
- Aina Aloha Curriculum. Use HODOE's Aina Aloha initiative, an ongoing program in its Office of Hawaiian Education, to provide connections to the historical background and significance of Mokapu Peninsula.
- Archaeological monitoring. All ground disturbing activities associated with the Proposed Action will be monitored by a qualified archaeologist.
- Archaeological Monitoring Plan and Report

Biological Resources: The Proposed Action would result in less than significant construction or operational period impacts to biological resources. MCBH completed informal consultation with U.S. Fish and Wildlife Service, Pacific Islands Office under Section 7 of the Endangered Species Act (ESA) for the Proposed Action's potential impacts to ESA-listed species. MCBH determined that the Proposed Action may affect, but is not likely to adversely affect four federally-listed Hawaiian waterbirds (Hawaiian duck, Hawaiian coot, Hawaiian gallinule and Hawaiian stilt) and USFWS concurred with the determination in its letter of December 16, 2020 (see Appendix E of the EA). BMPs and project design elements would be implemented to avoid or minimize impacts to protected species.

Transportation: The Proposed Action would result in less than significant impacts to transportation during the construction or operational periods. Construction-related traffic may result in slightly higher vehicle densities on a segment of H3 Freeway near MCBH Kaneohe Bay; however it is not expected to decrease levels of service on that freeway segment. Because construction vehicles and equipment would enter MCBH Kaneohe Bay through its Main Gate and avoid off-base neighborhoods along Mokapu Road, it is unlikely to directly impact off-base neighborhoods near Mokapu Gate.. Operational period traffic conditions would be similar to future without project conditions.

Natural Hazards: The Proposed Action would result in less than significant construction or operational period impacts on seismic, tropical cyclone, tsunami, or sea level rise frequency or severity at the project site or at Mokapu Peninsula, as the new facilities would be designed in accordance with current building design codes and in consideration of sea level rise predictions. Existing and proposed new facilities would not be located in areas expected to be affected by chronic flooding due to long-term sea level rise of 3.2 feet, although some undeveloped portions of campus adjacent to Mokapu Central Drainage Channel may be affected. The Proposed Action would continue an existing use within the same property boundary, and the intensity of its use would be the same with or without the project.

Public Health and Safety: The Proposed Action would result in less than significant construction or operational period impacts to public health and safety. Construction activities and related short-term traffic increases to, from, and around the project area may present risks to public health and safety; however, compliance with construction period traffic control plans and the securing of construction areas would avoid or minimize the potential for construction period public health and safety hazards to pedestrians, bicyclists, motorists, and Mokapu ES students. The Preferred Alternative is not expected to result in environmental health and safety risks that would disproportionately affect children. Analyses in the EA also indicates that construction and operation of the Proposed Action would not result in disproportionately high and adverse human health or environmental effects on any minority or low-income populations, including off-base population groups.

Hazardous Materials and Wastes: The Proposed Action would result in less than significant impacts involving hazardous materials and wastes. The Proposed Action would generally result in short-term and temporary construction period impacts (related to the disposal or use of hazardous and regulated materials) that would be limited to the local project area, contained within the boundaries of MCBH Kaneohe Bay, and not affect off-base communities. Construction period impacts would avoided or minimized through BMPs and adherence to environmental permit conditions. BMPs and standard operating procedures would be implemented to manage and/or remove hazardous and regulated materials according to applicable federal, state, and local regulations during demolition activities that may disturb these materials. During the operational period, Mokapu ES would minimize its

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use of hazardous materials on campus, and handle, store, and dispose of hazardous or regulated materials and wastes in accordance with applicable regulations, and consequently reduce their risks to school students, employees, and visitors.

Coastal Zone Management: The Hawaii Coastal Zone Management (CZM) Office has acknowledged that Proposed Action within MCBH Kaneohe Bay is an activity that is covered by the Navy and Marine Corps de minimis list under the Coastal Zone Management Act and would not result in any reasonably foreseeable direct or indirect effects to uses or resources within the Hawaii Coastal Zone.

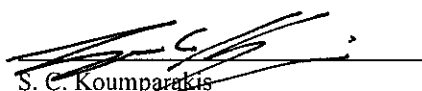
Mitigation Measures:

Mitigation measures are proposed for cultural resources to avoid or reduce the impacts of the Proposed Action to less than significant levels. The proposed mitigation measures are included in Attachment 1.

Public Outreach: MCBH and HIDEOE solicited public and agency comments during a scoping period from March 19, 2020 through April 16, 2020. Comments received during the scoping period were considered in preparing the Draft EA. MCBH and HIDEOE released the Draft EA for a 30-day public review from November 8, 2020 to December 8, 2020 to inform the public of the Proposed Action and to allow the opportunity for public review and comment. A notice of availability of the Draft EA was published in the Honolulu Star Advertiser on November 8, 9, and 10, 2020 and in the State the Office of Planning and Sustainable Development (OPSD) publication *The Environmental Notice* on November 8, 2020. Copies of the Draft EA were made available through OPSD and MCBH Kaneohe Bay webpages. Eleven public comments were received on the Draft EA during the 30-day public comment period. HIDEOE and MCBH considered and addressed substantive comments appropriately in the Final EA. The Draft EA comments and written responses are included in Appendix H of the Final EA.

Finding: Based on the analysis presented in the EA, which has been prepared in accordance with the requirements of NEPA and Department of the Navy (DON) policies and procedures (32 CFR Part 775), DON finds that implementation of the proposed action as set out in Alternative 1 (Preferred Alternative) will not significantly impact the quality of the human environment. This analysis fulfills the requirement of NEPA and CEQ regulations; therefore an EIS will not be prepared.

Electronic copies of this EA and Finding of No Significant Impact may be obtained by written request to: Marine Corps Base Hawaii Box 63002 Attention: ECPD Director Kaneohe Bay Hawaii 96863-3002.



S. C. Koumparakis
Colonel, U.S. Marine Corps
Commanding Officer, Marine Corps Base Hawaii

11 October 2022
Date

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ATTACHMENT 1

The following is a summary of proposed mitigation measures for cultural resources impacts. The proposed mitigation measures for cultural resources are those included in the Memorandum of Agreement Among Marine Corps Base Hawaii, Hawaii State Historic Preservation Officer, and Hawaii Department of Education Regarding Mōkapu Elementary School Campus Improvements Aboard Marine Corps Base Hawaii found in Appendix B of the EA that would offset the unavoidable adverse impacts to historic properties resulting from the Preferred Alternative.

Historic Context Booklet: HIDEOE shall ensure the preparation of a historic context booklet on Mokapu ES and its historical background and significance as a mid-century school in Hawaii within 6 months following execution of the MOA. A Qualified Preservation Professional shall produce this booklet, which shall include an architectural description of the existing school including its character-defining features and discussion of the local and broader national context of finger plan schools. The booklet will be designed to make technical information accessible to educators, elementary school students, and the general public. HIDEOE shall also post an electronic copy of the completed booklet on the Mokapu ES website within six months of completion of the new school facility and distribute a notice of the posting via the school's social media sites such as Facebook and Instagram.

Inventory List of Finger Plan Public Elementary Schools in Hawaii: HIDEOE shall ensure the preparation of an inventory list of finger plan public elementary schools in Hawaii built between 1945 and 1965, including name; location; date of construction; name of architect/company if known; whether the full campus was built at one time or rather began with just a few buildings; material (concrete, concrete masonry unit, wood), root type (hip, gable, shed, low slope/flat); single or multiple floors; traditional finger plan with center spine or variation; and at least one photo such as an aerial image. This inventory list shall be completed within six months following execution of the MOA.

Interpretive Display: HIDEOE shall install in the entry lobby of the new school a wall-mounted display case incorporating documentation, photographs, and other graphic materials to inform the Mokapu ES community and visitors of the school's historic context, including the historic relevance of the original school facilities. The display case shall be mounted on the wall in the entry lobby of the new school, and installed and visible prior to the official opening of the new school. The HIDEOE shall maintain this interpretive signage display in the entry lobby of the new school for at least five years, or the duration of the MOA.

Aina Aloha Curriculum: HIDEOE shall use its Aina Aloha initiative, an ongoing program in the HIDEOE's Office of Hawaiian Education, to provide connections to the historical background and significance of Mokapu Peninsula. The Aina Aloha program currently provides the support, guidance, and resources to incorporate Hawaiian knowledge, practice, and perspectives in all grade levels. With Mokapu Peninsula as the foundational "place" for the school's learning, the Aina Aloha curriculum provides educators, staff, and administrators with fundamental knowledge of and appreciation for the indigenous culture, history, places, and language of Hawaii. Within 60 days following completion of each school year for five (5) years or the duration of the MOA, HIDEOE shall provide signatories and consulting parties with documentation to show how HIDEOE incorporated aspects of the history of Mokapu Peninsula into the Aina Aloha program during that school year, including any site visits.

Archaeological Monitoring, Monitoring Plan, and Monitoring Report: HIDEOE shall ensure that all ground disturbing activities associated with the Proposed Action are monitored by an archaeologist meeting the professional qualifications. The archaeologist shall prepare an archaeological monitoring plan (AMP). The MCBH Cultural Resources Manager (CRM) shall review and approve the Draft AMP prior to the commencement of any project-related archaeological work. HIDEOE shall distribute an electronic copy of the Final Archaeological Monitoring Report (AMR) to the MCBH CRM for their records. MCBH shall provide the Hawaii SHPO with an electronic copy of the Final AMR.