

## NEPA Action EA/EIS Publication Form

**Project Name:** Construction of a C-40A Aircraft Maintenance Hangar (MILCON P-2001)  
Final Environmental Assessment

**Island:** Oahu

**District:** City and County of Honolulu, Oahu, Hawaii

**TMK:**

**Permits:** Consultation under Section 106 of the NHPA; Consultation under Section 7 of the Endangered Species Act; State of Hawaii Office of Planning and Sustainable Development Planning Division Coastal Zone Management Act; Notice of General Permit Coverage (NGPC) from the State of Hawaii Department of Health.

**Applicant or Proposing Agency:** Naval Air Force Reserve VR-51

(Address, Contact Person, Telephone)

**Approving Agency:** N/A

(Address, Contact Person, Telephone)

**Consultant:** N/A

**Status:** After careful review of the EA, the Navy and Marine Corps have selected the Hangar 104 Site for construction of the C-40A hangar and aircraft apron. This alternative includes the continued operations of the C-40A. The Navy and Marine Corps concluded that the Proposed Action will not result in significant impacts to the quality of the human environment. The Finding of No Significant Impact (FONSI) is based on the analysis contained in the Final EA, including the conservation measures and BMPs detailed throughout, as well as the mitigation measures. The EA may be obtained by downloading an electronic copy from the MCBH website: <https://mcbhawaii.usmc.afpims.mil/Offices-and-Staff/Environmental> or by contacting: Naval Facilities Engineering Systems Command, Pacific, Attn: EV21 Project Mgr. MCBH C-40A Hangar EA, 258 Makalapa Drive, Suite 100, Joint Base Pearl Harbor-Hickam, HI 96860-3134. Email: [NAVFAC\\_PAC\\_EV\\_RECEIVE2@us.navy.mil](mailto:NAVFAC_PAC_EV_RECEIVE2@us.navy.mil).

**Summary** (Provide proposed action and purpose/need in less than 200 words. Please keep the summary brief and on this one page):

The Environmental Assessment (EA) has been prepared in accordance with the National Environmental Policy Act (NEPA), Department of Navy Chief of Naval Operations (OPNAV) Manual 5090.1, and Marine Corps Order 5090.2 Volume 12. The Proposed Action is to construct an aircraft maintenance hangar for new United States (U.S.) Naval Air Force Reserve VR-51 C-40A aircraft on Marine Corps Base Hawaii (MCBH). VR-51 is a tenant on MCBH. Although the transition to the C-40A aircraft has already occurred, this EA analyzes impacts associated with construction of a maintenance hangar, in addition to operational impacts of the C-40A. At the time of the transition, the Navy did not anticipate the need for a new hangar to support the new airframe. The Navy recognizes that this EA needed to analyze operations impacts; therefore, the EA was revised to include operational impacts. The Draft EA was circulated for public review from May 17, 2023 to June 16, 2023. Substantive public comments were received that required the Action Proponent to review the proposed action and potential construction and operations impacts. The Draft EA was revised and recirculated for another formal public review from March 08, 2025-April 07, 2025.

This EA evaluates the potential environmental direct and indirect impacts of the Proposed Action to the following resources: air quality, water resources, natural resources, natural hazards and resiliency, cultural resources, infrastructure, noise, and hazardous materials and waste.

The EA may be obtained by downloading an electronic copy from the MCBH website <https://mcbhawaii.usmc.afpims.mil/Offices-and-Staff/Environmental>

Revised February 2012

**DEPARTMENT OF DEFENSE**

United States Navy and United States Marine Corps

**FINDING OF NO SIGNIFICANT IMPACT FOR CONSTRUCTION OF A C-40A AIRCRAFT MAINTENANCE HANGAR AT MARINE CORPS BASE HAWAII (MCBH) KANEHOE BAY, OAHU, HAWAII**

In accordance with the National Environmental Policy Act (NEPA) (42 U.S. Code §~ 4321-4370h); OPNAV Manual 5090.1, and Marine Corps Order 5090.2 Volume 12, the Navy gives notice that an Environmental Assessment (EA) has been prepared and, based on the analysis contained in the EA, an Environmental Impact Statement (EIS) need not be prepared to construct a C-40A aircraft maintenance hangar at MCBH to support United States (U.S.) Naval Air Force Reserve operations, in addition to operational impacts of the C-40A. The Final EA is incorporated by reference into this Finding of No Significant Impact (FONSI). The Draft EA was circulated for public review from May 17, 2023 to June 16, 2023. Substantive public comments were received that required the Action Proponent to review the proposed action and potential construction and operations impacts. The Draft EA was revised and recirculated for another formal public review in 2025.

The EA analyzed two action alternatives, as well as a no action alternative, for the construction and associated operations of a C-40A hangar at MCBH, Kaneohe Bay. Although the transition to the C-40A aircraft already occurred, the EA analyzed impacts associated with construction of a maintenance hangar in addition to operational impacts of the C-40A. This action will provide adequate hangar space for the maintenance and protection of C-40A aircraft operated by Fleet Logistics Support Squadron 51 (VR-51) of the Naval Air Force Reserve. VR-51 is a tenant on MCBH. The Navy evaluated effects of building the proposed hangar at the Hangar 104 site and Green Field site. Construction of the proposed hangar would not increase personnel or C-40A operations at MCBH. The Navy selected the Hangar 104 site as the Preferred Alternative.

**Agency Coordination and Public Involvement:** Pursuant to Section 7(a)(2) of the Endangered Species Act (ESA), the Marine Corps, on behalf of the Navy, conducted informal consultation with the U.S. Fish and Wildlife Service (USFWS) regarding potential impacts to ESA-listed species of the Preferred Alternative. The Marine Corps determined the Proposed Action may affect but is not likely to adversely affect ESA-listed species or has no effect on ESA-listed species. The USFWS concurred that the construction may affect but is not likely to adversely affect ESA-listed species or has no effect by letter dated March 22, 2023. On March 3, 2023, the State of Hawaii Office of Planning and Sustainable Development, Planning Division acknowledged receipt of the Marine Corps determination that the action falls under the Navy's Coastal Zone Management Act De Minimis Activities List and would not result in any reasonably foreseeable direct or indirect effects to uses or resources within the Hawaii Coastal Zone. In accordance with Section 106 of the National Historic Preservation Act (NHPA), the Navy engaged in consultation with the Hawaii State Historic Preservation Officer (SHPO), Native Hawaiian Organizations, and other consulting parties to develop a Memorandum of Agreement (MOA) resolving adverse effects to historic properties. The MOA was signed on February 20, 2026.

The Navy published a Notice of Availability for the review of the Draft EA, including the determination of adverse effect on historic properties under the NHPA Section 106 consultation, in the Honolulu Star-Advertiser and in a press release on April 28, 2023. The public had 30 days to comment on the Draft EA, as well as the Section 106 determination. The Draft EA was made available on the State of Hawaii's Environmental Review Program website and on the MCBH website. Ultimately, 59 comments were

received during the public comment period and individually addressed in Appendix A, Public Comments and Responses. Substantive public comments were received that required the Navy to relook at the proposed action and potential construction and operations impacts. The Draft EA was revised and recirculated for another formal public review from March 08, 2025 to April 07, 2025. The Revised Draft EA was made available on the State of Hawaii's Environmental Review Program website, on the MCBH website, and on the NAVFAC Pacific website. During the second comment period, 30 comments were received and individually addressed. All comments received during both public comment periods were fully considered by the Navy prior to rendering a decision on the Proposed Action. Public and agency comments from both comment periods are provided in Appendix A of the Final EA.

**Summary of Environmental Effects:** The EA focused analysis on the potential resources most affected by the Proposed Action (Final EA Chapter 3), considering the context and intensity of the impacts potentially associated with the action. The Final EA did not identify any significant impacts on the human environment or any resource that would be caused by the Proposed Action at either alternative (Final EA, Table 5-1, Comparison of Alternatives). The Proposed Action will have less than significant impacts to eight resource categories analyzed in detail in the Final EA: air quality, water resources, biological resources, natural hazards and resiliency, cultural resources, infrastructure, hazardous materials and waste, and noise.

The short-term effects upon air quality and increased potential for storm water runoff and soil erosion during the proposed demolition and construction activities are de minimis and would be reduced or avoided through the use of best management practices (BMPs). Proposed construction would result in short-term, intermittent emissions resulting from the operation of construction equipment, vehicles, and privately owned vehicles, and dust from site clearing, grubbing, and grading. All construction-related emissions would be below de minimis threshold levels (Final EA, Table 3.1-1) and thus, do not impact the attainment areas of the State of Hawaii and island of Oahu. Construction activities would result in approximately 468 tons of carbon dioxide emitted over the duration of construction. Operations of the C-40A aircraft would introduce new air emission sources via the transition of C-40A aircraft; however, emissions from the C-20G aircraft would be reduced. Based on the estimated change in aircraft operation and maintenance activities, the analysis estimated the change in aircraft operation air pollutants emissions using the applicable emission factors provided by the Air Force's Air Emissions Guide for Air Force Mobile Sources (Air Force Civil Engineer Center, 2020). All emissions would be below federal thresholds and would not affect the State of Hawaii and the island of Oahu's National Ambient Air Quality Standards attainment status (Final EA, Table 3.1-1). Operations of the C-40A aircraft would not significantly increase air emissions or impact local air quality standards per Final EA Table 3.1-3.

During construction, site preparation, grading, grubbing, demolition of existing facilities, and utility trenching may indirectly result in soil erosion, sedimentation, and transport of pollutants with a potential to reach downstream waters. A Notice of General Permit Coverage (NGPC) from the State of Hawaii Department of Health for a Notice of Intent – Construction will be required. The project will also adhere to MCBH's existing permits and compliance agreements (Final EA, Section 3.2.2.2). The new hangar will be constructed with Low Impact Development (LID) elements and appropriate conservation measures to the maximum extent technically feasible in accordance with DoD facility criteria. Implementation and compliance with appropriate BMPs will minimize these temporary, construction-related impacts. Operations will include the use of minor amounts of hazardous materials to perform aircraft maintenance activities. Any hazardous material spills will be cleaned up in accordance with standard operating practices. With the use of BMPs for spill avoidance and response, storm water protection, and the use of a Low Level Foam fire protection system concomitant with integration of an option for a water only fire protection system in the hangar, operating a new hangar on the Hangar 104 Site would have less than significant

impacts to marine waters and groundwater resources.

In accordance with NHPA Section 106, the Navy consulted with the Hawaii SHPO, Native Hawaiian Organizations, other interested parties, and the public to resolve adverse effects to historic properties resulting from the proposed undertaking. The Section 106 consultation process involved coordination and meetings beginning with the November 21, 2021 consultation letter to the Hawaii SHPO and consulting parties. The Navy and USMC held a series of consultation meetings from 2021-2025. Consultations concluded with a February 20, 2026 MOA signed by the Navy, USMC, and Hawaii SHPO.

In developing the Proposed Action, the Navy reviewed hangar site alternatives including other military airfields on Oahu (Final EA, Section 2.4) and alternative locations on MCBH. The Navy also explored modification of the existing hangars and determined that it was not feasible to alter them to accommodate the size, weight, and height of the C-40A. The Preferred Alternative, Hangar 104, is preferred as it eliminates the need to demolish and replace several supporting buildings, parking areas, access roads, and utility lines. Demolition of Hangar 104, and construction of the new Type III Hangar would have an adverse effect on the Naval Air Station (NAS) Kaneohe Aviation Historic District and the Kaneohe NAS National Historic Landmark (NHL). The proposed mitigation measures within the MOA would minimize and mitigate the adverse effects using the following measures:

- Preparation of a Historic Structures Report (HSR) for Building 301, a contributing element to the Aviation District;
- Development of a web-based “adventure” application that includes a 360-degree immersive view and interaction with the hangar, district, and landscape;
- Development of an Environmental Systems Research Institute (ESRI) digital StoryMap that presents the land-use of the Mokapu Peninsula prior to establishment of MCBH;
- Design and installation of an interpretive sign along the H3 with an overview of MCBH;
- Installation of four previously manufactured interpretive signs at Archaeological Site 50-80-11-158 7411;
- Design and installation of interpretive displays in Building 216;
- Consultation on the design of the new hangar;
- Archaeological monitoring and, if necessary, testing and data recovery.

The proposed mitigation measures agreed to in the February 2026 MOA ensure the adverse effects under NHPA Section 106 are mitigated below the level of significance under NEPA.

MCBH, on behalf of the Navy, conducted informal consultation with USFWS, Pacific Islands Office under Section 7 of the ESA for the Proposed Action’s potential impacts to ESA-listed species (Final EA, Appendix C). MCBH submitted a Biological Assessment to the USFWS Pacific Islands Office in January 2023 which found the Proposed Action would have no effect on, or is not likely to adversely affect, any special status species. On March 22, 2023, the USFWS Pacific Islands Office responded that with the incorporation of Conservation Measures, effects to listed species are either too small to be meaningful or measurable, or extremely unlikely to occur during construction. (Final EA, Table 2-3.) Construction activities would occur at previously developed and actively used areas where aircraft and machinery are in regular use, and appropriate conservation measures and BMPs would be implemented to minimize impacts

to vegetation and wildlife.

The C-40A aircraft operations and functions are similar to the C-20G aircraft operations. There would not be any new or increased operational impacts to habitat under the Proposed Action, thus having less than significant impacts to bird and other wildlife habitat, mammals, or birds.

The Navy evaluated the Proposed Action with respect to natural hazards and resiliency. The Preferred Alternative would be located in an area where flood hazards are possible, but not within a 100-year floodplain. With anticipated sea level rise, the airfield area would be subject to increased flooding over time; however, these effects would be experienced by the base overall and the Proposed Action would not increase resiliency hazards compared to existing conditions. As part of the design process, seismic and tsunami compliance aspects would be incorporated as required by DoD Unified Facility Codes.

Utility use (water, wastewater, electric) for the proposed hangar would remain unchanged from current levels and adequate infrastructure is available to meet the project's needs. Overall, the project would provide necessary hangar infrastructure for VR-51 to inspect, service, maintain, and protect its C-40A aircraft, increasing mission effectiveness.

The Navy also evaluated the use of materials and generation of waste from the Proposed Action. Demolition of older structures may involve abatement of lead-based paint and asbestos-containing materials. With the use of BMPs and appropriate health and safety procedures, effects from these hazardous materials would not be significant. Demolition of Hangar 104 is estimated to generate approximately 9500 tons of waste, which would consist primarily of concrete and steel. This demolition waste would be disposed of at the PVT Landfill, which routinely includes source separation of recyclable construction waste. The hangar would use a Low Level Foam fire protection system concomitant with integration of an option for a water-only fire protection system in accordance with DoD policy. Effects from materials and waste would be less than significant.

Construction noise would generally be lower than existing aircraft noise levels in the airfield area. Under the Preferred Alternative, construction noise would occur primarily during day-light hours. At 500 feet from the construction source, noise would decrease to approximately 54 decibel (dB) resulting in noise levels that would be indistinguishable within the acoustic environment of the airfield (MCBH, 2022A). Construction noise would not be perceptible to on-base or off-base residents or sensitive receptors.

Annual flight operations, maintenance and static operations, closed pattern altitudes, and flight tracks not associated with C-20G aircraft would remain as described under existing conditions. The following would change under implementation of the Proposed Action:

- C-20G flight, maintenance and static operations would be reduced by 50% to accommodate the reduction in C-20G aircraft from 2 to 1.
- C-40A flight, maintenance and static operations would be introduced and operate along the same flight tracks as C-20G aircraft.
- C-40A aircraft would complete 113 sorties annually

As with the Existing Conditions, noise generated by aircraft operations at MCBH would occur both within and outside of the airfield. Similar to the Existing Conditions, the 65 dB Day-Night Average Sound Level (DNL) contour extends east and west of the base boundary by approximately 1.5 and 2.0 miles, respectively. Implementation of the Proposed Action would result in a reduction of 8 acres beyond the base boundary at the noise level of 65 DNL and above. There would not be any increase in DNL values at representative

points of interest (POI) under the Preferred Alternative. Maximum Sound Exposure Levels (SELs) would be identical to SELs under the Existing Conditions at respective POIs. Transient military fighter aircraft departures would continue to be the primary contributor and occur infrequently. (Final EA, Appendix F).

**Summary of Cumulative Effects:** Cumulative impacts to air quality, water resources, biological resources, natural hazards and resiliency, cultural resources, infrastructure, hazardous materials and waste, and noise would be less than significant for construction and operation of the Proposed Action. The past, present, and future actions listed in Table 4-1 of the Final EA represent projects relevant to the Proposed Action.

Cumulatively, construction emissions from the Proposed Action and other planned construction would result in temporary increases in criteria pollutants and carbon dioxide; however, these emissions would fall below de minimis levels and would not affect air quality standards. Construction of the Proposed Action may coincide with construction of other projects on MCBH that could cumulatively increase sedimentation of stormwater. With the use of BMPs to comply with MCBH NPDES permits, plans, and orders regarding water quality resources, the cumulative adverse effects to stormwater and water quality would be minor.

The Proposed Action and other construction projects planned at MCBH would introduce noise, heavy equipment movement, air emissions and truck traffic that could displace or disturb biological resources. Planned construction would occur predominantly at previously developed and actively used areas that are not deemed important habitats for special-status species. Conservation measures would be applied to projects to avoid or minimize potential effects to wildlife (including ESA-listed species) during the construction. For operations, considering the projects are largely upgrades to or replacement of existing infrastructure, the nature of the projects would not introduce new noise sources, nor significantly change the amount of impervious surfaces. Overall, the proposed action would not contribute to significant cumulative impacts to biological resources.

The NAS Kaneohe Aviation District has been impacted over time with the demolition of 15 of the total 57 historic buildings, structures, and objects since nomination of the district in 2006. The Home Basing action (2023-2027) will demolish and replace Hangar 103 and five other support buildings (159, 160, 161, 183, and 184). Cumulatively, with the Proposed Action, a total of 22 historic buildings, structures and objects would be demolished since nomination of the district. The Marine Corps has entered into a MOA under the NHPA to resolve adverse effects resulting from the Home Basing action. While two of the hangars along the Bravo Ramp would be replaced, implementation of mitigation measures in accordance with their respective MOAs would resolve adverse effects and the impacts would not be significant enough to remove the listing/ eligibility of the Aviation Historic District or the removal of the Kaneohe NAS NHL. For these reasons, cumulative impacts to cultural resources are reduced to less than significant levels under NEPA.

Existing infrastructure (roads, housing, and utilities) would be sufficient to accommodate current and planned actions and anticipated base populations. Modernization of facilities, including those under the proposed action, would have less than significant cumulative effects on infrastructure.

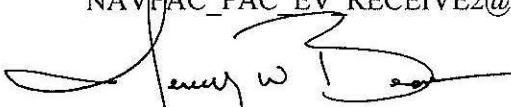
Combined, future demolition and construction projects across MCBH would increase the demand for construction materials (steel, concrete, asphalt, etc.) on Oahu. A few projects would occur within the same timeframe, possibly causing adverse effects in light of recent inflation and global supply chain issues in the construction market. Most construction materials (finished goods or raw materials) are imported from the Continental U.S., which may induce additional ship traffic to Oahu, but overall, the effects would be minimal when compared to overall shipment of goods to and from the island. Demolition debris would be transferred to the PVT Landfill, which currently recycles approximately 80 percent of received waste. Overall, the Proposed Action would result in less than significant cumulative effects on materials and waste.

FINDING OF NO SIGNIFICANT IMPACT FOR CONSTRUCTION OF A C-40A AIRCRAFT MAINTENANCE HANGAR AT MARINE CORPS BASE HAWAII KANEOHE BAY, OAHU, HAWAII

Construction noise associated with projects at MCBH would result in temporary increased noise in the region of influence. Many current and future projects may overlap temporally and geographically with the construction period of the Proposed Action. The Home Basing initiative includes a wide range of projects planned between 2023 and 2027 that would involve potential construction noise. Noise BMPs would be implemented as practical to reduce noise to sensitive receptors. The predominant noise sources in the project area and region of influence are the aircraft using MCBH Kaneohe Bay airfield. This includes aircraft flying to and from the runway, taxiing between the runway and the Bravo and Charlie ramps, and use of the helicopter pads and West Field facilities. However, the Proposed Action would not result in significant cumulative noise impacts within the region of influence.

**Finding:** After careful review of the EA, the Navy and Marine Corps have selected the Hangar 104 Site for construction of the C-40A hangar and aircraft apron. This alternative includes the continued operations of the C-40A. The Navy and Marine Corps concluded that the Proposed Action will not result in significant impacts to the quality of the human environment. This FONSI is based on the analysis contained in the attached EA, including the conservation measures and BMPs detailed throughout, as well as the mitigation measures to which the Navy committed in the February 2026 MOA.

The EA addressing this Proposed Action may be obtained by downloading an electronic copy from the 'Environmental Evaluations' section of the MCBH website (<https://www.mcbhawaii.marines.mil/Offices-and-Staff/Environmental/#tab/environmental-evaluations>) or by contacting: Naval Facilities Engineering Systems Command, Pacific, Attn: EV21 Project Mgr. MCBH C-40A Hangar EA, 258 Makalapa Drive, Suite 100, Joint Base Pearl Harbor-Hickam, HI 96860-3134. Email: NAVFAC\_PAC\_EV\_RECEIVE2@us.navy.mil.



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