

**DEPARTMENT OF WAR  
DEPARTMENT OF THE NAVY**

**FINDING OF NO SIGNIFICANT IMPACT FOR THE RED HILL WATER TREATMENT FACILITY AT  
JOINT BASE PEARL HARBOR-HICKAM, OAHU, HAWAII**

Pursuant to the National Environmental Policy Act (NEPA, 42 U.S.C. § 4321 et seq.) and applicable federal NEPA implementing regulations in place at the time the Environmental Assessment (EA) was initiated in June 2023, the Department of the Navy (the Navy) gives notice that an EA has been prepared and an Environmental Impact Statement (EIS) is not required for the Red Hill Water Treatment Facility at Honolulu, Hawaii. This action will be implemented as set out in Alternative 1 (Preferred Alternative).

**Proposed Action:** The Navy proposes to construct and operate a new water treatment facility at Red Hill Bulk Fuel Storage Facility (RHBFSF) to reconnect water from the Navy’s Red Hill Shaft to the JBPHH drinking water system and discontinue the treatment and discharge of water into Halawa Stream. Currently, water pumped from the Red Hill Shaft is treated at an onsite granular activated carbon (GAC) water treatment system, then discharged to Halawa Stream. The Proposed Action would include the construction of a new, permanent on-site GAC water treatment facility and the associated utilities, infrastructure, and site improvements. Additionally, an interim, modified GAC water treatment system is currently under installation at Red Hill to replace the existing onsite GAC water treatment system. The Proposed Action includes connection of the interim water treatment system to the Navy drinking water system until the permanent water treatment facility is operational. Both the permanent water treatment facility and the interim water treatment system would treat water from the Red Hill Shaft to meet National Primary Drinking Water Regulations (NPDWR) and State of Hawaii Department of Health (HDOH) Safe Drinking Water Standards before it is distributed to the Navy drinking water system.

**Purpose and Need:** The purpose of the Proposed Action is to restore the Red Hill Shaft as a drinking water source to provide adequate resiliency and redundancy to the Navy’s water system for consumers and multiple Department of War operations at JBPHH; in compliance with NPDWR and HDOH Safe Drinking Water Standards, and as delineated in the 2022 Red Hill Shaft Recovery and Monitoring Plan (RHSRMP) and as directed in the HDOH 2022 Emergency Order, to develop a water treatment and monitoring system to recover the Red Hill Shaft as a drinking water source. The Proposed Action is needed because potable water from the Red Hill Shaft has been unavailable to support users and activities on the Navy’s potable water system since November 2021, and because JBPHH needs an additional water source to ensure adequacy of its drinking water system.

**Alternatives Analyzed:** Alternatives were proposed for analysis based upon the following site selection screening factors:

- A. Technical feasibility
- B. Efficiency of operations and maintenance
- C. Impacts to sensitive environmental and cultural resources
- D. Location on property controlled by the Navy or another federal agency

The Navy considered two action alternatives that meet the purpose of and need for the Proposed Action.

**Alternative 1 (Preferred Alternative):** The Preferred Alternative includes the construction and operation of a permanent GAC water treatment facility supporting a permitted capacity of approximately 5 MGD (limited to an annualized average daily volume of approximately 5 MGD), as well as connection of the interim GAC water treatment system to the Navy drinking water system. The proposed permanent water treatment facility would utilize GAC pressure vessels to treat water from the Red Hill Shaft before distributing it to the Navy drinking water system. GAC technology is identified by the EPA as the best available technology for removing organic contaminants in drinking water. The proposed facilities would be located within RHBFSF installation boundary at three separate sites. The permanent water treatment facility would be located at the lower site to the west of the existing onsite GAC water treatment system and the Lower Access Road. Additional support facilities would be located at the upper site. An aboveground

## **FINDING OF NO SIGNIFICANT IMPACT FOR THE RED HILL WATER TREATMENT FACILITY AT JOINT BASE PEARL HARBOR-HICKAM, OAHU, HAWAII**

fire protection water storage tank would be constructed at an uphill location. The storage tank is required to provide adequate fire protection infrastructure at the permanent water treatment facilities.

Due to the sites' sloping topography, grading and earthwork would be needed to create level areas for the facilities, equipment, access roads, and construction work areas. Construction access would be provided through the existing RHBFSF Gate. A construction staging area would be provided on an adjacent State of Hawaii Department of Transportation (HDOT) Right of Way (ROW). Access to this staging area would utilize an existing State of Hawaii Department of Agriculture (HDOA)-owned driveway off Halawa Valley Street and a new connection to an existing roadway access to the HDOT ROW that would continue across Halawa Stream to the proposed permanent water treatment facility site. Construction activities would generally be restricted to daylight hours except for occasions where night work is required (e.g., connections to existing utilities).

The Preferred Alternative also includes the connection of the interim GAC water treatment system to the Navy drinking water system until the permanent GAC water treatment facility is operational. Both the permanent water treatment facility and the interim water treatment system would treat water from the Red Hill Shaft to meet NPDWR and HDOH Safe Drinking Water Standards before it is distributed to the Navy drinking water system. Connection of the interim water treatment system to the Navy drinking water system would include the installation of new piping for treated water from the interim system to the point of connection to the Navy drinking water system near the Red Hill Shaft. Installation of the interim system, in preparation for subsequent connection to the Navy drinking water system, is anticipated to be completed and in operation by 2027. Connecting the permanent treatment facility and interim system to the Navy drinking water system would require approval from the HDOH under HAR Section 11-20-30 (New and Modified Public Water Systems).

Alternative 2: Action Alternative 2 is the same as the Preferred Alternative except that it also includes six packed tower aerators (PTA) and six primary feeder pumps in the permanent water treatment facility. Aeration involves the mass transfer of volatile organic contaminants (VOCs) from water to air by increasing the water surface area exposed to air. The PTAs and primary feeder pumps would fit within the same water treatment facility footprint as the Preferred Alternative. PTAs were originally considered by the Navy for the proposed water treatment facility because they are effective at removing significant concentrations of hydrocarbon contamination from drinking water and when used ahead of the GAC filters, they can greatly extend the life of the GAC filters. However, groundwater monitoring for the Red Hill Shaft has not detected any level of total petroleum hydrocarbon (TPH) contamination since November 2023, and because the Red Hill fuel storage tanks have been defueled, removing the primary contamination source, the incorporation of PTAs would not provide an additional benefit in drinking water quality.

No Action Alternative: The No Action Alternative would not meet the purpose and need for the Proposed Action; however, as required by NEPA the No Action Alternative is also carried forward for analysis in this Environmental Assessment (EA). The No Action Alternative was used to analyze the consequences of not undertaking the Proposed Action and to establish a comparative baseline for analysis. Under the No Action Alternative, the Proposed Action would not occur. The permanent GAC water treatment facility would not be constructed at Red Hill and the interim GAC water treatment system would not be connected to the Navy drinking water system. Consequently, the No Action Alternative would not restore the Red Hill Shaft as a source of potable water for JBPHH or communities serviced by the Navy drinking water system and the water pumped from the Red Hill Shaft would continue to be treated and discharged to Halawa Stream. The No Action Alternative analyzes the consequences of not undertaking the Proposed Action and serves to establish a comparative baseline for the analysis of the action alternatives.

Alternatives Considered but not Carried Forward for Detailed Analysis: Several alternative locations were considered but not carried forward for detailed analysis based on the screening factors (see Table 1).

**FINDING OF NO SIGNIFICANT IMPACT FOR THE RED HILL WATER TREATMENT FACILITY AT JOINT BASE PEARL HARBOR-HICKAM, OAHU, HAWAII**

**Table 1 Alternatives Considered But Not Carried Forward For Detailed Analysis**

<i>Alternative Name</i>	<i>Location</i>	<i>Reason for Dismissal</i>
Alternative 3: Interim Modified GAC Water Treatment System Only	On-site at RHBFSF.	Not a viable long-term solution (screening factor A).
Alternative 4a: Alternative Locations for the Water Treatment Facility	Uphill site at RHBFSF	Requires significant mechanical systems to transport water uphill for treatment (screening factor A).  Site would be overly constrained by underlying RHBFSF tanks (screening factor B).  Highly visible from surrounding community. (screening factor C).
Alternative 4b: Alternative Locations for the Water Treatment Facility	Aliamanu Military Reservation	Requires significant new infrastructure to transport water from the Red Hill Shaft under Interstate H-201 and neighborhoods and back again to connect to the existing JBPHH drinking water system point of connection (screening factor A).  Construction dust and noise, as well as background operational noise, could negatively impact surrounding community (screening factor C).  Requires disruption to vehicle and pedestrian traffic to construct pipelines across State and County rights-of-way (screening factor D).
Alternative 5: Alternative Water Treatment Technology	On-site at RHBFSF.	The Navy considered built-in-place GAC contactors as an alternative to the proposed GAC pressure vessels. Built-in-place GAC contactors were found to incur greater operation and maintenance difficulties and require a larger facility footprint requirement when compared to GAC pressure vessels (screening factor B).
Alternative 6: Alternative Utility Points of Connection	United States Army Garrison Hawaii owned property near to project site and HDOT property.	Points of connection were coordinated with utility providers. Alternative points of connection were dismissed due to technical feasibility concerns (screening factor A).
Alternative 7: Non-Potable Water Reuse	JBPHH	Does not meet the purpose and need and non-potable water use would require substantial new infrastructure for delivery to potential customers (screening factor A).

**FINDING OF NO SIGNIFICANT IMPACT FOR THE RED HILL WATER TREATMENT FACILITY AT JOINT BASE PEARL HARBOR-HICKAM, OAHU, HAWAII**

**Table 1 Alternatives Considered But Not Carried Forward For Detailed Analysis**

<i>Alternative Name</i>	<i>Location</i>	<i>Reason for Dismissal</i>
Alternative 8: Reconnect the Red Hill Shaft Without a Water Treatment Facility	JBPHH	The Navy also considered an alternative that entails operation of the Red Hill Shaft without water treatment. Frequent water quality results observed by the Navy since mid 2024 indicate the Red Hill Shaft is no longer compromised and therefore does not warrant the need for treatment prior to use as a prospective drinking water source. However, the Navy is committed to pursuing a permanent treatment facility. In light of that commitment and public sentiment regarding the consumption of raw water from the Red Hill Shaft, and as delineated in the 2022 RHSRMP and as directed in the 2022 HDOH EO, to provide effective treatment and therefore remediation of any residual contaminants which may migrate into the Red Hill Shaft groundwater source and its capture zone; the Navy has elected not to carry forward this alternative for analysis because the provision of a treatment system is appropriate in order to restore the RHS as a drinking water source. A water treatment facility sustains a groundwater capture zone, treats raw water for any constituents of concern, complies with regulations, and mitigates the discharge of water that is not utilized for the drinking water system.

**Environmental Effects:** No significant direct, indirect, or cumulative environmental impact would occur from implementing the Proposed Action. The purpose of an EA is to discuss impacts in proportion to their potential environmental effects, with only a brief discussion of impacts on resource areas that are negligible or nonexistent. Thus, this EA does not evaluate airspace, geological resources, marine biological, land use, visual, transportation, or socioeconomics because the Proposed Action would have little to no impact on these resources.

The Proposed Action has the potential to impact the following resource areas, which are discussed in more detail in the EA: public health and safety, water resources, hazardous materials and wastes, cultural resources, terrestrial biological resources, infrastructure, air quality, and noise.

**Public Health and Safety:** Standard security measures would be implemented to secure equipment and prevent public access into the construction and operation areas, and compliance with occupational safety and health regulations, standards, and instructions would minimize the potential for workplace accidents.

Operations would maintain the groundwater capture zone within the aquifer underlying RHBFSF and would restore the Red Hill Shaft as a source of safe, potable water to the users of the Navy drinking water system, in accordance with the long-term actions outlined in the Red Hill Shaft Recovery and Monitoring Plan (2022). The Preferred Alternative would have a beneficial impact to this resource area.

**Water Resources:** The Preferred Alternative would be subject to a National Pollutant Discharge Elimination System (NPDES) permit and would implement a Stormwater Pollution Prevention Plan (SWPPP) and erosion control best

## **FINDING OF NO SIGNIFICANT IMPACT FOR THE RED HILL WATER TREATMENT FACILITY AT JOINT BASE PEARL HARBOR-HICKAM, OAHU, HAWAII**

management practices (BMPs) to avoid or minimize potential impacts associated with temporary increased runoff and erosion during construction. The project would implement permanent Low Impact Development (LID) features to mitigate the impact of development on stormwater runoff and protect stormwater quality. There would be no increase in existing stormwater peak discharge rates to offsite areas, and the existing drainage patterns would be maintained to the extent practicable.

Once operational, the project would restore the beneficial use of the Red Hill Shaft as a safe, potable drinking water source. The Navy would no longer discharge up to 5 MGD to Halawa Stream. Instead, this water would be used to supply the Navy drinking water system and would therefore reduce groundwater withdrawal at other Navy drinking water wells. The Preferred Alternative would have a beneficial impact to this resource area.

Hazardous Materials and Wastes: The use of hazardous materials (i.e., fuel, oil, etc.) and generation of hazardous wastes during construction would be transported, stored, handled, and disposed of in accordance with federal and state regulations. Excess soil and shallow groundwater (if encountered), must be properly characterized, handled, stored, managed, and disposed of as Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)-waste in accordance with JBPHH policy, and federal and state regulations.

The spent GAC media would be tested for toxicity. If it exceeds hazardous waste thresholds, an appropriate disposal facility would be identified, and the waste would be transported to an appropriate facility. Diesel fuel would be stored onsite to power emergency generators. Only aboveground fuel storage containers would be utilized, and they would have secondary containment to contain a release. The Preferred Alternative would have a less than significant impact to this resource area.

Cultural Resources: A large portion of the project area was heavily modified by several events including the early 20th century ground-disturbing activities related to the construction of the Red Hill Fuel Facility, agricultural use during the Plantation Era, the construction of the H-201 and H-3 highways, the channelization of Halawa Stream, and the installation of environmental monitoring and water treatment operation infrastructure. Despite the high amount of development, several historic sites still exist in the area. An archaeological inventory survey conducted for the Proposed Action identified two sites within the federal portion of the area of potential effects (APE) that the Navy is treating as eligible for listing in the National Register of Historic Places (NRHP). The Preferred Alternative would result in the removal or disturbance of these sites: Site 50-80-13-7785 and Temporary Site 2. Site 50-80-13-7785 is a complex of seven features associated with possible earlier ranching uses and later mid-20th century military development. Temporary site 2 is a complex of three features (a retaining wall, a concrete structure, and a road alignment) associated with plantation era use of the project area.

Pursuant to Section 106 of the National Historic Preservation Act (NHPA) and in accordance with Stipulation VI of the 2012 *Programmatic Agreement among the Commander Navy Region Hawaii, the Advisory Council on Historic Preservation and the Hawaii State Historic Preservation Officer Regarding Navy Undertakings in Hawaii*, as amended in 2024, the Navy consulted with the Hawaii State Historic Preservation Officer (SHPO) and consulting parties, including the Office of Hawaiian Affairs and other Native Hawaiian Organizations regarding the Preferred Alternative. The Navy determined the Preferred Alternative would result in an adverse effect to historic properties and prepared a Memorandum of Agreement (MOA) to resolve adverse effects consistent with 36 C.F.R. 800.6. The MOA was agreed to and signed by the Navy and SHPO in February 2026.

Terrestrial Biological Resources: The Preferred Alternative would include approximately 8.9 acres of permanent vegetation removal, primarily non-native scrub forest. The project location does not include critical habitat, but BMPs would be implemented to avoid or minimize potential impacts to protected species.

In accordance with Section 7 of the Endangered Species Act (ESA), the Navy consulted with the U.S. Fish and Wildlife Service (USFWS) regarding the Preferred Alternative. In a letter to the USFWS dated January 7, 2025, the Navy

## **FINDING OF NO SIGNIFICANT IMPACT FOR THE RED HILL WATER TREATMENT FACILITY AT JOINT BASE PEARL HARBOR-HICKAM, OAHU, HAWAII**

determined that the Preferred Alternative may affect, but is not likely to adversely affect the Hawaiian stilt, band-rumped storm petrel, Hawaiian petrel, Newell's shearwater, and Hawaiian hoary bat, or jeopardize the continued existence of these species. USFWS concurred with the Navy's determination in a letter dated February 27, 2025. The Preferred Alternative would have a less than significant impact to this resource area.

Infrastructure: The restoration of the Red Hill Shaft as a potable water source would increase redundancy within the Navy's drinking water system and decrease reliance on the Navy's other water sources. The Preferred Alternative would have a beneficial impact to water infrastructure.

Wastewater volumes from the site would be within existing sewer capacity. The sanitary sewer connection would require an agreement with the Army and a sewer connection permit from the City and County of Honolulu Department of Planning and Permitting for use of their systems. The Preferred Alternative would have a less than significant impact to wastewater infrastructure.

The project would require a new point of connection from the Hawaiian Electric Company (HECO) grid. Energy demand is within HECO's existing grid capacity and the Navy is coordinating with HECO on the anticipated demand and point of connection. Proposed undergrounding of the new electrical circuits would improve the new systems' reliability and resilience. The Preferred Alternative would have a less than significant impact to energy infrastructure.

Air Quality: The Preferred Alternative would generate short-term, temporary indirect air emissions during the construction period (e.g., fugitive dust, exhaust emissions from construction equipment and vehicles, etc.). During the operational phase, temporary, minor emissions would be generated from vehicle trips to the site and running the emergency generators. The Preferred Alternative would have a less than significant impact to air quality.

Noise: Construction would result in short-term increases in daytime noise. Noise impacts would be greatest at the nearest residences along Madrona Place within the Army's Red Hill Housing neighborhood. Noise from construction would comply with applicable federal, state, and local regulations.

Operation of the proposed permanent water treatment facility would generate negligible impacts on the noise environment. The GAC filters and associated equipment at the proposed water treatment facility generally run at low noise levels. The emergency generators would be housed within dedicated structures and would not impact the ambient noise environment. The Preferred Alternative would have a less than significant impact to this resource area.

**Mitigation Measures:** Consistent with Section 106 of the NHPA and implementing regulations 36 C.F.R. 800.6, the MOA between the Navy and SHPO incorporates measures to avoid, minimize, and mitigate adverse effects to cultural resources. Implementation of the MOA will reduce impacts to less than significant under NEPA. Best management practices that will be employed at the project site are detailed in Final EA Section 2.5 and Table 2-4. These include: implementation of a construction dust control plan; erosion control; low impact development practices; invasive species control and decontamination procedures; implementation of the JBPHH Green Waste Policy; pre-construction surveys of protected bird species; shielded lighting; protections for seabirds and Hawaiian hoary bats; documentation of archaeological Site 50-80-13-7785 and Temporary Site 2; archaeological monitoring of all ground-disturbance construction activities; hazardous materials and wastes management; construction noise control; and construction traffic and safety management.

**Public Outreach:** The Navy has implemented a range of efforts to notify the public. The Navy initiated Pre-Assessment Early Consultation between May 24, 2024, to June 3, 2024, to inform the preparation of the Draft EA. An informational letter was sent to 79 potentially interested stakeholders including elected officials, government agencies, neighborhood boards, Native Hawaiian Organizations, utilities, and community organizations to obtain comments on the proposed project during the pre-assessment consultation process. A total of seven responses were received. The responses are provided in Appendix A-1 of the EA, and relevant comments were addressed in the Draft EA.

**FINDING OF NO SIGNIFICANT IMPACT FOR THE RED HILL WATER TREATMENT FACILITY AT JOINT BASE PEARL HARBOR-HICKAM, OAHU, HAWAII**

2025). The Navy distributed the notice of availability of the Draft EA to the same distribution list as the pre-assessment consultation, including elected officials, government agencies, neighborhood boards, Native Hawaiian Organizations, utilities, and community organizations. The Navy announced the availability of the EA at the Pearl City Neighborhood Board meeting on March 25, 2025. The Navy provided an email notification to the Aiea Neighborhood Board ahead of their April 8, 2025, meeting and to the Aliamanu-Salt Lake Neighborhood Board and Ewa Neighborhood Board ahead of their April 10, 2025, meetings. Additionally, the Star-Advertiser published a newspaper article discussing the availability of the Draft EA on April 14, 2025, and Hawaii News Now published a news report discussing the availability of the draft EA on April 16, 2025.

The Navy made the Draft EA available for public review during a 30-day comment period, from March 21, 2025, to April 20, 2025, at the Aiea Public Library and the main branch of the Hawaii State Public Library. Additionally, the Navy's NEPA information webpage included the Draft EA at: <https://pacific.navfac.navy.mil/About-Us/National-Environmental-Policy-Act-NEPA-Information>.

Twenty public comments were received on the Draft EA, from nineteen different individuals. One commenter submitted two comment letters. A total of 108 separate comments were extracted for analysis; these were sorted into 32 generalized categories and responses were prepared for each of these generalized categories. A list of the commentors, a table of consolidated responses to public comments, and copies of the individual public comment letters is provided in Appendix A-2 of the EA.

**Finding:** Based on the analysis presented in the EA, which has been prepared in accordance with the requirements of NEPA and applicable federal implementing regulations in place at the time the EA was initiated in June 2023, and in coordination with the United States Fish and Wildlife Service, the Hawaii State Historic Preservation Officer, and the Hawaii State Office of Planning and Sustainable Development the Navy 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. Therefore, an EIS will not be prepared.

Interested parties may obtain an electronic copy of the Final EA and FONSI from the Navy's NEPA Information webpage: <https://pacific.navfac.navy.mil/About-Us/National-Environmental-Policy-Act-NEPA-Information> .

26 MAY 2026

Date



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**FINDING OF NO SIGNIFICANT IMPACT FOR THE RED HILL WATER TREATMENT FACILITY AT  
JOINT BASE PEARL HARBOR-HICKAM, OAHU, HAWAII**

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