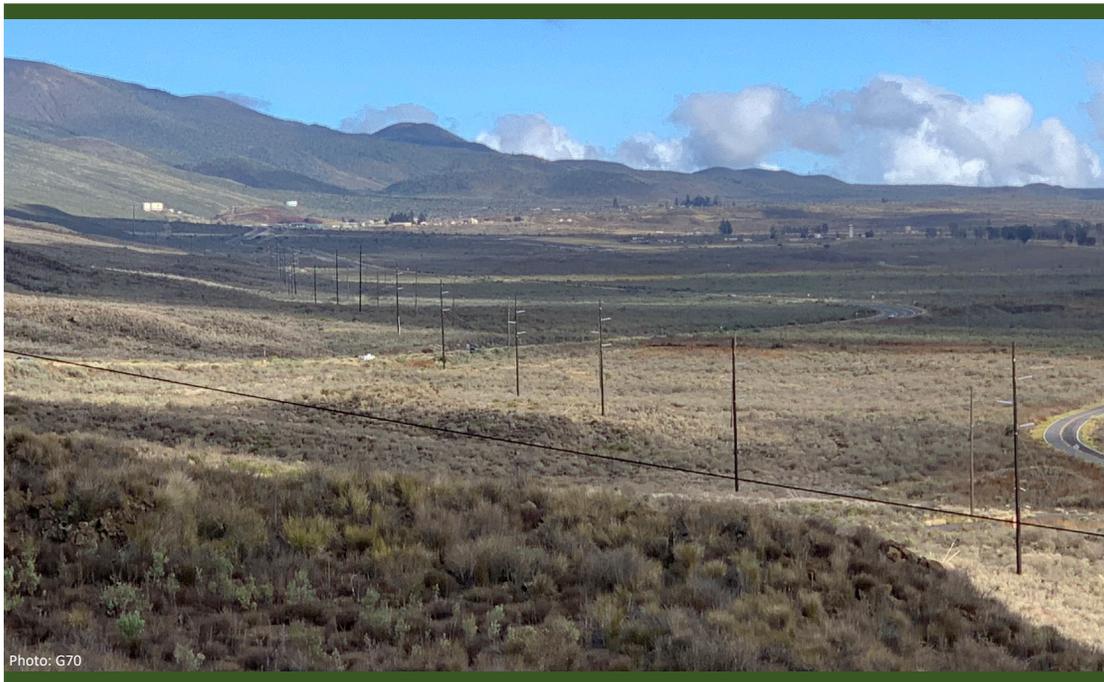


# ARMY TRAINING LAND RETENTION AT PŌHAKULOA TRAINING AREA

## FINAL ENVIRONMENTAL IMPACT STATEMENT VOLUME II: APPENDICES A-M

PŌHAKULOA TRAINING AREA, ISLAND OF HAWAI'I, HAWAI'I



**U.S. ARMY**

PREPARED FOR DIRECTORATE OF PUBLIC WORKS, U.S. ARMY GARRISON-HAWAII

PREPARED BY U.S. ARMY CORPS OF ENGINEERS, HONOLULU DISTRICT  
UNDER CONTRACT W9128A19D0004

APRIL 2025

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# ARMY TRAINING LAND RETENTION AT PŌHAKULOĀ TRAINING AREA

FINAL  
ENVIRONMENTAL IMPACT STATEMENT

VOLUME II: APPENDICES A-M

PŌHAKULOĀ TRAINING AREA, ISLAND OF HAWAI'I, HAWAI'I



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**NOTE ABOUT USE OF HAWAIIAN DIACRITICAL MARKINGS:**

This document honors the proper use and presentation of Hawaiian language including use of diacritical marks, the glottal stop and the macron (‘okina and kahakō). When Hawaiian words are used in a proper name of an agency or organization that does not utilize diacritical marks, then official titles are shown without diacritical marks. Diacriticals may not appear in direct quotes or public comments. Elsewhere in this document, diacritical markings are used for Hawaiian terminology, proper names and place names.

# Volume II

## Table of Contents

### Appendices A-M

**Appendix A: NEPA-HEPA Compliance Guide**

**Appendix B: EIS Notices**

EIS Scoping Notices

Notice of Intent

Amended Notice of Intent

Notification for the EIS Preparation Notice

Affidavit of Publication for Scoping Public Notices

Draft EIS Notices

Notice of Availability

Notification for the Draft EIS

Affidavit of Publication for Draft EIS Public Notices

Second Draft EIS Notices

Notice of Availability

Notification for the Second Draft EIS

Affidavit of Publication for the Second Draft EIS Public Notices

**Appendix C: Public Meeting Materials**

Public Scoping open House Materials

Posters

Fact Sheet

Flyer

Direct Mail Postcard

Questions and Answers

Draft EIS Public Meeting Materials

Posters

Fact Sheet

Flyer

Direct Mail Postcard

Second Draft EIS Public Meeting Materials

Posters

Fact Sheet

Flyer

Direct Mail Postcard

**Appendix D: Scoping and Draft EIS Responses**

Responses to Scoping Comments

Responses to Draft EIS Comments

Responses to Second Draft EIS Comments

**Appendix E: NEPA and other Environmental Planning Documents and Existing Management Measures**

**Appendix F: State General Lease S-3849**

State General Lease S-3849 (1964)

2010 Amendment to State General Lease S-3849

**Appendix G: Court-Ordered Management Plan for Leased Lands at Pohakuloa**

**Appendix H: Land Retention Estate Assumptions**

**Appendix I: Cultural Impact Assessment**

**Appendix J: Archaeological Literature Review**

**Appendix K: Biological Species Descriptions**

**Appendix L: State and County Plans and Policies**

**Appendix M: Army Land Retention Community Engagement 2024**

# NEPA-HEPA Compliance Guide



## Appendix A

# NEPA-HEPA COMPLIANCE TABLE

NEPA Reference	HEPA Reference	Requirement	Location in SDEIS & Notes
<b>Recommended Format/Content Requirements</b>			
40 CFR 1502.10(a), 1502.11; 32 CFR 651.43(a)		Cover Sheet	<ul style="list-style-type: none"> <li>Cover Sheet</li> </ul>
40 CFR 1502.10(c); 32 CFR 651.43(c)	HAR 11-200.1-24(e)	Table of contents	<ul style="list-style-type: none"> <li>Table of contents</li> </ul>
	HAR 11-200.1-24(g)(1)	A detailed map (such as a USGS topographic map, Flood Insurance Rate Maps, Floodway Boundary Maps, or state sea level rise exposure area maps, as applicable) and a related regional map.	<ul style="list-style-type: none"> <li>Figure 1-1</li> <li>Figure 3-11</li> </ul>
	HAR 11-200.1-24(g)(6)	Summary technical data, diagrams, and other information necessary to enable an evaluation of potential environmental impact by commenting agencies and the public.	<ul style="list-style-type: none"> <li>Section 2.2</li> <li>Section 2.3</li> <li>Chapter 3 – All resource section analyses</li> </ul>
	HAR 11-200.1-24(g)(6)	A list of relevant EAs or EISs	<ul style="list-style-type: none"> <li>Appendix E</li> </ul>
NEPA 107(a)(2)(D, E); 40 CFR 1502.25(b); 32 CFR Part 651, Appendix E (b)(2)		The Draft EIS shall list all Federal permits, licenses, and other entitlements which must be obtained in implementing the proposal.	<ul style="list-style-type: none"> <li>Section 1.4.3</li> <li>Table 1-1</li> </ul>

NEPA Reference	HEPA Reference	Requirement	Location in SDEIS & Notes
	HAR 11-200.1-24(k)	List of necessary approvals required for the action from governmental agencies, boards, or commissions or similar groups having jurisdiction.	
40 CFR 1502.10(h), 1502.17; 32 CFR 651.43(h), and Appendix E (b)(8)		List of Preparers	<ul style="list-style-type: none"> <li>• Section 7.1</li> </ul>
	HAR 11-200.1-24(r)	Disclosure of the identity of the persons, firms, or agency preparing the Draft EIS	<ul style="list-style-type: none"> <li>• Section 7.2</li> </ul>
NEPA 102 (2) (D); 40 CFR 1502.24; 32 CFR 651.39(c), 651.44(b)(3-4), 651.52(d)		Agencies shall insure the professional integrity, including the scientific integrity of the discussions and analyses in environmental impact statements. They shall identify any methodologies used and shall make explicit reference by footnote. An agency may place discussion of methodology in an appendix.	<ul style="list-style-type: none"> <li>• Section 3.1.4</li> <li>• Chapter 3 – Resource section methodology and significance criteria</li> <li>• Section 7.2</li> </ul>
NEPA 107(e); 40 CFR 1502.10(k), 1502.18; 32 CFR 651.43(k), and Appendix E (b)(11)		Appendices	<ul style="list-style-type: none"> <li>• Appendices A – L</li> </ul>
<b>Summary</b>			
40 CFR 1502.10(b), 1502.12; 32 CFR 651.43(b), and Appendix E (b)(2)		Summary	<ul style="list-style-type: none"> <li>• Executive Summary</li> </ul>

NEPA Reference	HEPA Reference	Requirement	Location in SDEIS & Notes
	HAR 11-200.1-24(d)	The draft EIS shall contain a summary that concisely discusses the following: <ol style="list-style-type: none"> <li>(1) Brief description of the action;</li> <li>(2) Significant beneficial and adverse impacts;</li> <li>(3) Proposed mitigation measures;</li> <li>(4) Alternatives considered;</li> <li>(5) Unresolved issues;</li> <li>(6) Compatibility with land use plans and policies, and a list of permits or approvals; and</li> <li>(7) A list of relevant EAs and EISs considered in the analysis of the preparation of the EIS.</li> </ol>	
<b>Purpose and Need</b>			
NEPA 107(d); 40 CFR 1502.10(d), 1503.14; 32 CFR 651.43(d), and Appendix E (b)(4)		Purpose and need for action	<ul style="list-style-type: none"> <li>• Section 1.3.2</li> <li>• Section 1.3.3</li> </ul>
	HAR 11-200.1-24(f)	Statement of purpose and need for the proposed action.	
	HAR 11-200.1-24(g)(2)	Objectives of the proposed action	<ul style="list-style-type: none"> <li>• Section 1.3.2</li> <li>• Section 1.3.3</li> </ul>
	HAR 11-200.1-24(g)(5)	Phasing and timing of the action	<ul style="list-style-type: none"> <li>• Section 2.1</li> </ul>
	HAR 11-200.1-24(l)	Consideration of all phases of the action	<ul style="list-style-type: none"> <li>• Section 2.1</li> <li>• Section 3.1.4</li> </ul>
	HAR 11-200.1-24(g)(4)	Use of state or county funds or lands for the action	<ul style="list-style-type: none"> <li>• Section 1.1</li> <li>• Section 1.3.1</li> <li>• Section 2.1</li> </ul>
<b>Alternatives</b>			

NEPA Reference	HEPA Reference	Requirement	Location in SDEIS & Notes
NEPA 102(2)(C)(iii); 40 CFR 1502.10I; 32 CFR 651.43(e), and Appendix E (b)(5)		Alternatives considered including the proposed action	<ul style="list-style-type: none"> <li>• Section 2.2</li> <li>• Chapter 3 – All resource section analyses</li> </ul>
40 CFR 1502.14; 32 CFR Part 651 Appendix E (b)(5)(ii)		Environmental impacts of the proposal and the alternatives in comparison form	<ul style="list-style-type: none"> <li>• Section 2.1.4</li> <li>• Section 2.2</li> <li>• Section 3.17.1</li> </ul>
NEPA 102(2)(C)(iii); 40 CFR 1502.14(a)		Explore and objectively evaluate all reasonable alternatives, and for all alternatives which were eliminated, briefly discuss the reasons for their having been eliminated	<ul style="list-style-type: none"> <li>• Section 2.2</li> </ul>
32 CFR Part 651, Appendix E (b)(5)(i)		A description of all reasonable alternatives, including the preferred action, alternatives beyond Army jurisdiction, and the no action alternative.	
32 CFR Part 651, Appendix E (b)(5)(iv)		Listing of any alternatives that were eliminated from detailed study. A brief discussion of the reasons for which each alternative was eliminated.	
	HAR 11-200.1-24(h)	Discussion of the alternative of no action as well as reasonable alternatives that could attain the objectives of the action. The Section shall include a rigorous exploration and objective evaluation of the environmental impacts of all such alternative actions	
NEPA 102(2)(C)(i); 40 CFR 1502.14(b)		Devote substantial treatment to each alternative including the proposed action so viewers may evaluate their comparative merits	<ul style="list-style-type: none"> <li>• Section 2.1</li> <li>• Section 2.2</li> </ul>
NEPA 102(2)(C)(i); 32 CFR Part 651, Appendix E (b)(5)(ii)		A comparative presentation of the environmental consequences of all reasonable alternative actions, including the preferred alternative.	
NEPA 102 (2)(C)(iii); 40 CFR 1502.14(c); 32 CFR		Include reasonable alternatives not within the jurisdiction of the lead agency	<ul style="list-style-type: none"> <li>• Section 2.2</li> </ul>

NEPA Reference	HEPA Reference	Requirement	Location in SDEIS & Notes
Part 651, Appendix E(b)(5)(i)			
	HAR 11-200.1-24(o)	Analyze reasonable alternatives to achieve countervailing benefits that would avoid environmental effects.	<ul style="list-style-type: none"> <li>Section 2.2</li> <li>Chapter 3 – All resource section analyses</li> </ul>
NEPA 102(2)(C)(iii); 40 CFR 1502.14(d); 32 CFR Part 651, Appendix E (b)(5)		Include the alternative of no-action	<ul style="list-style-type: none"> <li>Section 2.2.4</li> </ul>
40 CFR 1502.14(e); 32 CFR Part 651, Appendix E (b)(5)		Identify the agency’s preferred alternative	<ul style="list-style-type: none"> <li>Section 2.4</li> </ul>
<b>Affected Environment</b>			
	HAR 11-200.1-24(g)(3)	General description of the action’s technical, economic, social, cultural, and environmental characteristics.	<ul style="list-style-type: none"> <li>Chapter 3 – All resource section analyses</li> </ul>
NEPA 102(2)(C)(i); 40 CFR 1502.10(f), 1502.15; 32 CFR 651.43(f), Appendix E (b)(6)		Describe the environment of the area(s) to be affected or created by the alternatives under consideration	<ul style="list-style-type: none"> <li>Section 1.2</li> <li>Chapter 3 – All resource section analyses</li> </ul>
	HAR 11-200.1-24(i)	Description of the environmental setting including a description of the environment in the vicinity of the action, as it exists before commencement of the action, from both a local and regional perspective	<ul style="list-style-type: none"> <li>Chapter 3 – All resource section analyses</li> </ul>
	HAR 11-200.1-24(i)	Environmental resources that are rare or unique to the region and the action site (including natural or human-made resources of historic, cultural, archaeological, or aesthetic in significance).	<ul style="list-style-type: none"> <li>Section 3.2</li> <li>Section 3.3</li> </ul>

NEPA Reference	HEPA Reference	Requirement	Location in SDEIS & Notes
NEPA 101(b)(4); 40 CFR 1502.16(g); 32 CFR 651.15, and Appendix E (b)(7)(viii)		Urban quality, historic, and cultural resources, and the design of the built environment, including the reuse and conservation potential of various alternatives and mitigation measures.	<ul style="list-style-type: none"> <li>• Section 3.4</li> <li>• Section 3.8</li> <li>• Section 3.9</li> </ul>
NEPA 101(b)(4)	HAR 11-200.1-24(g)(7)	Historic perspective.	<ul style="list-style-type: none"> <li>• Section 1.1</li> <li>• Section 3.4</li> </ul>
	HAR 11-200.1-24(l)	Direct or indirect source of pollution from the proposed project.	<ul style="list-style-type: none"> <li>• Section 3.5</li> <li>• Section 3.6</li> </ul>
	HAR 11-200.1-24(i)	Population and growth characteristics of the area, population growth assumptions, and secondary population and growth impacts with the proposed action.	<ul style="list-style-type: none"> <li>• Section 3.10</li> </ul>
	HAR 11-200.1-24(l)	Population and growth impacts of the proposed action.	
	HAR 11-200.1-24(m)	Poses long-term risks to health and safety	<ul style="list-style-type: none"> <li>• Section 3.5</li> <li>• Section 3.6</li> <li>• Section 3.16</li> </ul>
<b>Environmental Consequences &amp; Potential Mitigation Measures</b>			
NEPA 102(2)(C)(i); 40 CFR 1502.10(g), 1502.16; 32 CFR 651.43(g), and Appendix E (b)(7)(iv)		Environmental impacts of the alternatives including the proposed action.	<ul style="list-style-type: none"> <li>• Chapter 3 – All resource section analyses</li> <li>• Section 3.17.1</li> <li>• Section 4.5</li> </ul>
	HAR 11-200.1-24(l)	Analysis of the probable impact of the proposed action on the environment and impacts of the natural or human environment on the action.	
NEPA 102(2)(C)(v); 40 CFR 1502.16; 32 CFR Part 651, Appendix E (b)(7)(xi)		Any probable adverse environmental effects that cannot be avoided.	<ul style="list-style-type: none"> <li>• Section 3.5</li> <li>• Section 3.6</li> <li>• Section 3.7</li> </ul>

NEPA Reference	HEPA Reference	Requirement	Location in SDEIS & Notes
	HAR 11-200.1-24(o)	Probable and unavoidable effects adverse to water or air pollution, urban congestion, threats to public health, or other consequences adverse to environmental goals and guidelines established by environmental response laws, coastal zone management laws, pollution control and abatement laws, and environmental policy including: HRS Chapter 128D (Environmental Response Law) HRS Chapter 205A (Coastal Zone Management) HRS Chapter 342B (Air Pollution Control) HRS Chapter 342C (Ozone Layer Protection) HRS Chapter 342D (Water Pollution) HRS Chapter 342E (Nonpoint Source Pollution Management and Control)	<ul style="list-style-type: none"> <li>• Section 3.8</li> <li>• Section 3.9</li> <li>• Section 3.12</li> <li>• Section 3.16</li> <li>• Section 3.17.1</li> <li>• Section 5.4</li> </ul>
		HRS Chapter 342F (Noise Pollution) HRS Chapter 342G (Integrated Solid Waste Management) HRS Chapter 342H (Solid Waste Recycling) HRS Chapter 342I (Special Wastes Recycling) HRS Chapter 342J (Hazardous Waste, including Used Oil) HRS Chapter 342L (Underground Storage Tanks) HRS Chapter 342P (Asbestos and Lead) HRS Chapter 344 (State Environmental Policy)	<ul style="list-style-type: none"> <li>• Section 5.3.2</li> </ul>
40 CFR 1502.14(f); 32 CFR 651.15, and Appendix E (b)(5)(iii)		Include appropriate mitigation measures not already included in the proposed action or alternatives.	<ul style="list-style-type: none"> <li>• Section 3.17.2</li> </ul>

NEPA Reference	HEPA Reference	Requirement	Location in SDEIS & Notes
40 CFR 1502.16(h); 32 CFR 651.15, 32 CFR Part 651, Appendix E (b)(7); 32 CFR Part 651, Appendix C		Means to mitigate adverse environmental impacts.	<ul style="list-style-type: none"> <li>• Section 3.2.6</li> <li>• Section 3.4.6</li> <li>• Section 3.11.6</li> <li>• Section 3.16.6</li> <li>• Section 3.17.2</li> </ul>
32 CFR Part 651, Appendix C	HAR 11-200.1-24(p)	Mitigation measure description, reason for selection (if applicable), timing, and provisions to ensure implementation.	<ul style="list-style-type: none"> <li>• Section 3.1.4</li> <li>• Section 3.2.6</li> <li>• Section 3.4.6</li> <li>• Section 3.11.6</li> <li>• Section 3.16.6</li> <li>• Section 3.17.2</li> </ul>
	HAR 11-200.1-24(p)	Timing of mitigation through phases of development to assure proper mitigation.	<ul style="list-style-type: none"> <li>• Section 3.2</li> <li>• Section 3.4</li> <li>• Section 3.11</li> <li>• Section 3.16</li> </ul>
<b>Cumulative Impacts</b>			
32 CFR 651.16(a), and Appendix E (b)(7)(ix)		Cumulative effects of the proposed action in light of other past, present, and foreseeable actions	<ul style="list-style-type: none"> <li>• Chapter 4 – Cumulative Impacts</li> </ul>
	HAR 11-200.1-24(i)	Related actions, public and private, existent or planned in the region.	
	HAR 11-200.1-24(l)	Interrelationships and cumulative environmental impacts of the proposed action and other related actions.	
<b>Direct and Indirect Effects</b>			

NEPA Reference	HEPA Reference	Requirement	Location in SDEIS & Notes
NEPA 102 (2)(C)(i); 40 CFR 1502.16(a); 32 CFR Part 651, Appendix E (b)(7)(i)		Direct effects and their significance	<ul style="list-style-type: none"> <li>Section 3.1.4</li> <li>Chapter 3 – All resource section analyses</li> </ul>
NEPA 102 (2)(C)(i); 40 CFR 1502.16(b); 32 CFR Part 651, Appendix E (b)(7)(ii)		Indirect effects and their significance	<ul style="list-style-type: none"> <li>Section 3.1.4</li> <li>Section 3.6</li> <li>Section 3.10</li> <li>Section 3.17.1</li> </ul>
	HAR 11-200.1-24(l)	Consideration of all consequences including direct and indirect effects	<ul style="list-style-type: none"> <li>Section 3.1.3</li> <li>Section 3.1.4</li> <li>Chapter 3 – All resource section analyses</li> </ul>
<b>Short-term Uses of the Environment and Maintenance and Enhancement of Long-term Productivity</b>			
NEPA 102(2)(C)(iv); 40 CFR 1502.16; 32 CFR Part 651, Appendix E (b)(7)(vii)		Relationship between short-term uses of the environment and the maintenance and enhancement of long-term productivity	<ul style="list-style-type: none"> <li>Section 5.6</li> </ul>
	HAR 11-200.1-24(m)	Trade-offs among short-term and long-term gains and losses with the proposed action	
<b>Cost Benefit Analysis</b>			
40 CFR 1502.23; 32 CFR Part 651, Appendix E (b)(4)		If a cost-benefit analysis relevant to the choice among environmentally different alternatives is being considered for the proposed action, it shall be incorporated by reference or appended to the statement as an aid in evaluating the environmental consequences.	<ul style="list-style-type: none"> <li>N/A</li> </ul>
<b>Incomplete Information/Unresolved Issues</b>			

NEPA Reference	HEPA Reference	Requirement	Location in SDEIS & Notes
40 CFR 1502.22; 32 CFR 651.44		When an agency is evaluating reasonably foreseeable significant adverse effects on the human environment in an environmental impact statement and there is incomplete or unavailable information, the agency shall always make clear that such information is lacking.	<ul style="list-style-type: none"> <li>Section 5.2</li> </ul>
40 CFR 1502.22(a); 32 CFR 651.44(a)		If the incomplete information relevant to reasonably foreseeable significant adverse impacts is essential to a reasoned choice among alternatives and the overall costs of obtaining it are not exorbitant, the agency shall include the information in the environmental impact statement.	<ul style="list-style-type: none"> <li>N/A</li> </ul>
	HAR 11-200.1-24(q)	Unresolved issues and how such issues will be resolved prior to the commencement of the proposed action.	<ul style="list-style-type: none"> <li>Section 5.2</li> </ul>
<b>Other Required Considerations</b>			
40 CFR 1502.16(e); 32 CFR Part 651, Appendix E (b)(7)(v)		Energy requirements and conservation potential of various alternatives and mitigation measures.	<ul style="list-style-type: none"> <li>Section 5.5</li> </ul>
40 CFR 1502.16(f)		Natural or depletable resource requirements and conservation potential of various alternatives and mitigation measures	
	HAR 11-200.1-24(n)	Identification of non-renewable resources	
	HAR 11-200.1-24(n)	Irreversible curtailment of the range of potential uses of the environment.	
NEPA 102(2)(C)(v); 40 CFR 1502.16; 32 CFR Part 651, Appendix E (b)(7)(vi)	HAR 11-200.1-24(n)	Irreversible or irretrievable commitments of resources	

NEPA Reference	HEPA Reference	Requirement	Location in SDEIS & Notes
	HAR 11-200.1-24(n)	Identification of unavoidable impacts	<ul style="list-style-type: none"> <li>Chapter 3 – All resource section analyses</li> <li>Section 3.17.1</li> <li>Section 4.5</li> <li>Section 5.4</li> </ul>
	HAR 11-200.1-24(n)	Possibility for environmental accidents.	<ul style="list-style-type: none"> <li>Section 3.5</li> <li>Section 3.16</li> </ul>
	HAR 11-200.1-24(l)	Secondary effects	<ul style="list-style-type: none"> <li>Section 3.6</li> <li>Section 3.10</li> </ul>
	HAR 11-200.1-24(m)	Extent to which the proposed action forecloses future options or narrows the ranges of beneficial uses of the environment.	<ul style="list-style-type: none"> <li>Section 5.6</li> </ul>
	HAR 11-200.1-24(o)	The rationale for proceeding with a proposed action, notwithstanding unavoidable effects.	<ul style="list-style-type: none"> <li>Section 5.6</li> </ul>
		Other interests and considerations of policies to offset adverse environmental effects of the proposed action.	<ul style="list-style-type: none"> <li>Chapter 3 – All resource section analysis</li> <li>Section 3.17.2</li> </ul>
<b>Consistency with Other Federal, State, and County Land Use Plans, Policies, and Controls</b>			
40 CFR Part 1502.16(c); 32 CFR Part 651, Appendix E (b)(7)(iii)		Possible conflicts between the proposed action and the objectives of Federal, regional, State, and local land use plans, policies and controls for the area concerned.	<ul style="list-style-type: none"> <li>Section 1.4.2</li> <li>Section 3.2</li> <li>Section 3.3</li> </ul>
	HAR 11-200.1-24(j)	Description of the relationship of the proposed action to land use and natural or cultural resources plans, policies, and controls for the affected area.	<ul style="list-style-type: none"> <li>Section 3.4</li> <li>Section 5.3</li> </ul>
<b>Circulation of the Environmental Impact Statement</b>			
40 CFR 1502.19; 32 CFR 651.45		Agencies shall circulate the entire draft and final environmental impact statements.	<ul style="list-style-type: none"> <li>Section 1.6</li> <li>Chapter 8</li> </ul>

NEPA Reference	HEPA Reference	Requirement	Location in SDEIS & Notes
	HAR 11-200.1-24(r)	The Draft EIS shall include a separate and distinct section that contains a list identifying all governmental agencies, other organizations and private individuals consulted in preparing the Draft EIS	<ul style="list-style-type: none"> <li>• Table 8-1</li> </ul>
40 CFR 1502.19(a); 32 CFR 651.45(e)(1), (h)		Agencies shall circulate the entire draft and final environmental impact statement to any Federal agency which has jurisdiction by law or special expertise with respect to any environmental impact statement involved and any appropriate Federal, State or local agency authorized to develop and enforce environmental standards.	<ul style="list-style-type: none"> <li>• Section 1.6</li> <li>• Chapter 8</li> </ul>
40 CFR 1502.19(b); 32 CFR 651.45(e)(2), (h)		Agencies shall circulate the entire draft and final environmental impact statement to the applicant if any.	<ul style="list-style-type: none"> <li>• N/A</li> </ul>
40 CFR 1502.19(c); 32 CFR 651.45(e)(3), (h)		Agencies shall circulate the entire draft and final environmental impact statement to any person, organization, or agency requesting the entire environmental impact statement.	<ul style="list-style-type: none"> <li>• Table 8-1</li> </ul>
40 CFR 1502.19(d); 32 CFR 651.45(h)		In the case of a final environmental impact statement, any person, organization, or agency which submitted substantive comments on the draft.	<ul style="list-style-type: none"> <li>• Table 8-1</li> </ul>
	HAR 11-200.1-27(b)(2)	The Final EIS shall consist of a list of persons, organizations, and public agencies commenting on the Draft EIS.	<ul style="list-style-type: none"> <li>• Table 8-1</li> <li>• Appendix D</li> <li>• Appendix O</li> </ul>
	HAR 11-200.1-27(b)(3)	The Final EIS shall consist of a list of persons or agencies who were consulted in preparing the Final EIS and those who had no comment shall be included in a manner indicating that no comment was provided.	<ul style="list-style-type: none"> <li>• Table 8-1</li> <li>• Appendix D</li> <li>• Appendix O</li> </ul>
<b>Comments and Responses in a Draft EIS</b>			
	HAR 11-200.1-24(s)(1)	The Draft EIS shall include a separate and distinct section that contains: Reproductions of all written comments submitted during the consultation period required in section 11-200.1-23	<ul style="list-style-type: none"> <li>• Appendix D</li> </ul>

NEPA Reference	HEPA Reference	Requirement	Location in SDEIS & Notes
	HAR 11-200.1-24(s)(2); HAR 11-200.1- 24(s)(2)(A)	Responses to all substantive written comments made during the consultation period required in section 11-200.1-23. Proposing agencies and applicants shall respond in the Draft EIS to all substantive written comments in one of two ways:  By grouping comment response under topic headings and addressing each substantive comment raised by an individual commenter under that topic heading by issue.	<ul style="list-style-type: none"> <li>• Appendix D</li> </ul>
	HAR 11-200.1-24(s)(4)	A summary of any EIS public scoping meetings, including a written general summary of the oral comments made, and a representative sample of any handout provided by the proposing agency or applicant related to the action provided at any EIS public scoping meeting.	<ul style="list-style-type: none"> <li>• Section 1.6</li> <li>• Appendix B</li> <li>• Appendix C</li> </ul>
	HAR 11-200.1-24(s)(5)	A list of those persons or agencies who were consulted and had no comment in a manner indicating that no comment was provided.	<ul style="list-style-type: none"> <li>• Table 8-1</li> </ul>
40 CFR 1506.6; 32 CFR 651.47		Public involvement	<ul style="list-style-type: none"> <li>• Section 1.6</li> <li>• Section 8.1</li> <li>• Appendix B</li> <li>• Appendix C</li> <li>• Appendix D</li> </ul>
	HAR 11-200.1-24(s)(6)	A representative sample of the consultation request letter.	<ul style="list-style-type: none"> <li>• Appendix C</li> </ul>

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## **EIS Notices**

### **EIS Scoping Notices**

Notice of Intent  
Amended Notice of Intent  
Notification for the EIS Preparation Notice  
Affidavit of Publication for Scoping Public Notices

### **Draft EIS Notices**

Notice of Availability (FR)  
Notification for the Draft EIS (ERP)  
Affidavit of Publication for Draft EIS Public Notices

### **Second Draft EIS Notices**

Notice of Availability (FR)  
Notification for the Second Draft EIS (ERP)  
Affidavit of Publication for the Second Draft EIS Public Notices



# **EIS Scoping Notices**

**Notice of Intent**

**Amended Notice of Intent**

**Notification for the EIS Preparation Notice**

**Affidavit of Publication for Scoping Public Notices**



# **Notice of Intent**

**(Office of the Federal Register, *Federal Register*, September 4, 2020)**



notice in the **Federal Register** to announce and seek comment on a rule review for 16 CFR parts 1107 and 1109, that is being conducted in fiscal year 2021 (85 FR 52078). Accordingly, the issues raised by crib manufacturers on testing and certification under 16 CFR parts 1107 and 1109, will be considered further in that proceeding.

The staff's briefing package containing the review is available on the CPSC website at: <https://www.cpsc.gov/Research—Statistics/Toys-and-Childrens-Products>, [www.regulations.gov](http://www.regulations.gov), and from the Commission's Division of the Secretariat at the location listed in the **ADDRESSES** section of this notice.

**Alberta E. Mills,**

*Secretary, Consumer Product Safety Commission.*

[FR Doc. 2020–19572 Filed 9–3–20; 8:45 am]

**BILLING CODE 6355–01–P**

## CORPORATION FOR NATIONAL AND COMMUNITY SERVICE

### Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Civic Engagement and Volunteering; Current Population Survey Supplement

**AGENCY:** Corporation for National and Community Service.

**ACTION:** Notice.

**SUMMARY:** The Corporation for National and Community Service (CNCS) has submitted a public information collection request (ICR) entitled The Civic Engagement and Volunteering Supplement for review and approval in accordance with the Paperwork Reduction Act.

**DATES:** Written comments must be submitted to the individual and office listed in the **ADDRESSES** section by October 5, 2020.

**ADDRESSES:** Written comments and recommendations for the proposed information collection should be sent within 30 days of publication of this notice to [www.reginfo.gov/public/do/PRAMain](http://www.reginfo.gov/public/do/PRAMain). Find this particular information collection by selecting “Currently under 30-day Review—Open for Public Comments” or by using the search function.

**FOR FURTHER INFORMATION CONTACT:** Copies of this ICR, with applicable supporting documentation, may be obtained by calling the Corporation for National and Community Service, Mary Hyde, at 202–606–6834 or email to [mhyde@cns.gov](mailto:mhyde@cns.gov).

**SUPPLEMENTARY INFORMATION:** The OMB is particularly interested in comments which:

- Evaluate whether the proposed collection of information is necessary for the proper performance of the functions of CNCS, including whether the information will have practical utility;
- Evaluate the accuracy of the agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions;
- Propose ways to enhance the quality, utility, and clarity of the information to be collected; and
- Propose ways to minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

### Comments

A 60-day Notice requesting public comment was published in the **Federal Register** on July 1, 2020 at Vol. 85 No. 127 FR 39537–39538. This comment period ended August 31, 2020. No public comments were received from this Notice.

*Description:* This information collection will be used to generate civic health reports at the National, State, and Metropolitan Statistical Area (MSA) levels and to disseminate these data to various stakeholders including state and local government offices, researchers, students and civic groups for strategic planning, grant writing purposes and research.

*Title of Collection:* Civic Engagement and Volunteering Supplement.

*OMB Control Number:* 3045–0139.

*Type of Review:* Renewal.

*Respondents/Affected Public:* U.S. Residents 16 years of age and older.

*Total Estimated Number of Annual Responses:* Approximately U.S. 60,000 residents.

*Total Estimated Number of Annual Burden Hours:* 6,670.

*Abstract:* CNCS has partnered with the U.S. Census to collect data and produced annual volunteering reports since 2002. CNCS is also mandated by the Serve America Act (2009) to produce an annual Civic health assessment in partnership with the National Conference on Citizenship. The proposed survey will be the only source of nationally representative data on the number of Americans who are active in their communities, through volunteering, social interactions, political activities and civic behaviors.

The purpose of collecting data on civic engagement and volunteering is to provide scholars, government officials and policymakers with official government measurement on civic behaviors in the United States.

Dated: August 28, 2020.

**Mary Hyde,**

*Director, Office of Research and Evaluation.*

[FR Doc. 2020–19589 Filed 9–3–20; 8:45 am]

**BILLING CODE 6050–28–P**

## DEPARTMENT OF DEFENSE

### Department of the Army

#### Environmental Impact Statement for Army Training Land Retention at Pōhakuloa Training Area in Hawai'i

**AGENCY:** Department of the Army; Defense (DOD).

**ACTION:** Notice of Intent.

**SUMMARY:** In accordance with the National Environmental Policy Act (NEPA) and the Hawai'i Environmental Policy Act (HEPA), the Department of the Army (Army) announces its intent to prepare an Environmental Impact Statement (EIS) to address the Army's proposed retention of up to approximately 23,000 acres of land currently leased to the Army by the state of Hawai'i (“State-owned land”) at Pōhakuloa Training Area (PTA) on the island of Hawai'i. As the proposed retention involves State-owned land, the EIS will be a joint NEPA–HEPA document; therefore, the public scoping processes will run concurrently and will jointly meet NEPA and HEPA requirements.

**DATES:** The Army invites public comments on the scope of the EIS during a 40-day public scoping period, beginning on the publication date of this Notice of Intent in the **Federal Register**.

**ADDRESSES:** Written comments should be submitted via the EIS website at: <https://home.army.mil/hawaii/index.php/PTAEIS>. Alternatively, comments can be emailed to [usarmy.hawaii.nepa@mail.mil](mailto:usarmy.hawaii.nepa@mail.mil), or mailed to: ATLR PTA EIS Comments, P.O. Box 3444, Honolulu, HI 96801–3444.

**FOR FURTHER INFORMATION CONTACT:** Please contact Mr. Michael Donnelly, PTA Public Affairs Officer, at (808) 969–2411 or by email to [michael.o.donnelly.civ@mail.mil](mailto:michael.o.donnelly.civ@mail.mil).

**SUPPLEMENTARY INFORMATION:** PTA has been used for training as early as 1938, but was not used routinely until 1943. PTA was formally established in 1956

through a maneuver agreement granted by the Territory of Hawai'i. In 1964, the State granted a 65-year lease of approximately 23,000 acres of land to the Army for military purposes. The lease expires on August 16, 2029. The 23,000 acres of State-owned land contain utilities, critical infrastructure, maneuver land, and key training facilities, some of which are not available elsewhere in Hawai'i. The land also provides access to approximately 110,000 acres of adjacent U.S. Government-owned land at PTA.

PTA encompasses approximately 132,000 acres of land used for training military personnel for combat. It is the only U.S. training area in the Pacific region where training units can complete all mission essential tasks, and the only U.S. training facility in the Pacific region that can accommodate larger than company-sized units for live-fire and maneuver exercises. The U.S. Army Hawaii (USARHAW) and other U.S. military units that train at PTA include the 25th Infantry Division, U.S. Marine Corps, U.S. Navy, U.S. Air Force, Hawaii National Guard, and U.S. Army Reserve.

The Army's retention of State-owned land within PTA is needed to enable USARHAW to continue to conduct military training to meet its current and future training requirements.

Retention of State-owned land is needed to allow access between major parcels of U.S. Government-owned land at PTA, retain substantial Army infrastructure investments, allow for future facility and infrastructure modernization, preserve limited maneuver area, provide austere environment training, and maximize use of the impact area in support of USARHAW-coordinated training. To understand the environmental consequences of the decision to be made, the EIS will evaluate the potential direct, indirect, and cumulative impacts of a range of reasonable alternatives that meet the purpose of, and need for, the Proposed Action. Alternatives to be considered, including the no action alternative, are (1) Full Retention, (2) Modified Retention, and (3) Minimum Retention and Access. Other reasonable alternatives raised during the scoping process and capable of meeting the project purpose and need will be considered for evaluation in the EIS.

Native Hawaiian organizations; Federal, state, and local agencies; and the public are invited to be involved in the scoping process for the preparation of this EIS by participating in a scoping meeting and/or submitting written comments. The scoping process will help identify potential environmental

impacts and key issues of concern to be analyzed in the EIS. Written comments must be sent within 40 days of publication of the Notice of Intent in the **Federal Register**. In response to the coronavirus (COVID-19) pandemic in the United States and the Center for Disease Control's recommendations for social distancing and avoiding large public gatherings, the Army will not hold public scoping meetings for this action. In lieu of the public scoping meetings, the Army will use other alternative means to enable public participation such as virtual meetings using online meeting/collaboration tools, teleconference, social media, or email, as appropriate. An EIS Scoping Virtual Open House and two in-person scoping comment stations will be held on Wednesday, September 23, 2020 from 4–9 p.m. During the EIS Scoping Virtual Open House, video presentations can be viewed online at <https://home.army.mil/hawaii/index.php/PTAEIS> and oral and written comments will be accepted. Oral comments will be accepted via phone by calling (808) 300-0220. The two in-person scoping comment stations will also be open to the public to accept oral comments via phone and written comments: One in-person scoping comment station will be in Hilo, and the other will be in Waimea, both on the island of Hawai'i; individuals making comments will maintain recommended social distance. Notification of the EIS Scoping Virtual Open House and in-person scoping comment stations date and time will also be published and announced in local news media outlets and on the EIS website. For those who do not have ready access to a computer or the internet, the scoping materials posted to the EIS website will be made available upon request by mail. Inquiries and requests for scoping materials may be made to Michael Donnelly, PTA Public Affairs Officer at (808) 969-2411 or by email at [michael.o.donnelly.civ@mail.mil](mailto:michael.o.donnelly.civ@mail.mil).

**Brenda S. Bowen,**

*Army Federal Register Liaison Officer.*

[FR Doc. 2020-19620 Filed 9-3-20; 8:45 am]

**BILLING CODE 5061-AP-P**

## DEPARTMENT OF DEFENSE

### Office of the Secretary

#### Uniform Formulary Beneficiary Advisory Panel; Notice of Federal Advisory Committee Meeting

**AGENCY:** Under Secretary of Defense for Personnel and Readiness, Department of Defense (DoD).

**ACTION:** Notice of Federal Advisory Committee meeting.

**SUMMARY:** The DoD is publishing this notice to announce the following Federal Advisory Committee meeting of the Uniform Formulary Beneficiary Advisory Panel will take place.

**DATES:** Open to the public Wednesday, September 23, 2020, from 12:00 p.m. to 6:00 p.m. (Eastern Daylight Time).

**ADDRESSES:** The open meeting will be held online. The phone number for remote access is CONUS: 888-469-2037; OCONUS: 1-517-308-9287; PARTICIPANT CODE: 8227323. These numbers and the dial-in instructions will also be posted on the Uniform Formulary Beneficiary Advisory Panel website at: <https://www.health.mil/About-MHS/OASDHA/Defense-Health-Agency/Operations/Pharmacy-Division/Beneficiary-Advisory-Panel>.

**FOR FURTHER INFORMATION CONTACT:**

Colonel Paul J. Hoerner, USAF, 703-681-2890 (Voice), [dha.ncr.j-6.mbx.baprequests@mail.mil](mailto:dha.ncr.j-6.mbx.baprequests@mail.mil) (Email). Mailing address is 7700 Arlington Boulevard, Suite 5101, Falls Church, VA 22042-5101. Website: <https://www.health.mil/About-MHS/OASDHA/Defense-Health-Agency/Operations/Pharmacy-Division/Beneficiary-Advisory-Panel>. The most up-to-date changes to the meeting agenda can be found on the website.

**SUPPLEMENTARY INFORMATION:** This meeting is being held under the provisions of the Federal Advisory Committee Act (FACA) (5 U.S.C., Appendix), the Government in the Sunshine Act (5 U.S.C. 552b), and 41 CFR 102-3.140 and 102-3.150.

The Panel will review and comment on recommendations made to the Director, Defense Health Agency, by the Pharmacy and Therapeutics Committee, regarding the Uniform Formulary.

*Purpose of the Meeting:* The DoD is publishing this notice to announce that the following Federal Advisory Committee meeting of the Uniform Formulary Beneficiary Advisory Panel will take place.

#### Agenda

1. Sign-In
2. Welcome and Opening Remarks
3. Scheduled Therapeutic Class Reviews (Comments will follow each agenda item)
  - a. Psoriasis Agents—NA
  - b. Sleep Disorders—Wakefulness Promoting Agents
  - c. White Blood Cell Stimulants—Filgrastims
  - d. White Blood Cell Stimulants—Pegfilgrastims

# **Amended Notice of Intent**

**(Office of the Federal Register, *Federal Register*, September 23, 2020)**



Sally Luttrell—Assistant Inspector General for Investigations.

Deborah L. Harker—Assistant Inspector General for Audit.

Pauletta Battle—Deputy Assistant Inspector General for Financial Management and Transparency Audits.

Susan Barron—Deputy Assistant Inspector General for Financial Sector Audits.

Donna F. Joseph—Deputy Assistant Inspector General for Cyber and Financial Assistance Audits.

*Treasury Inspector General for Tax Administration/Department of the Treasury*

Phone Number: (202) 622-6500

CIGIE Liaison—David Barnes (Acting) (202) 622-3062

Lori Creswell—Deputy Chief Counsel.

Gladys Hernandez—Chief Counsel.

Heather Hill—Assistant Inspector General for Audit, Management Services and Exempt Organizations.

James Jackson—Deputy Inspector General for Investigations.

Nancy LaManna—Assistant Inspector General for Audit, Management, Planning, and Workforce Development.

Russell Martin—Assistant Inspector General for Audit, Returns Processing, and Accounting Services.

Michael McKenney—Deputy Inspector General for Audit.

Susan Moats—Assistant Inspector General for Investigations—Field.

Trevor Nelson—Assistant Inspector General for Investigations, Cyber, Operations and Investigative Support.

Richard Varn II—Chief Information Officer.

Danny Verneuille—Assistant Inspector General for Audit, Security, and Information Technology Services.

Matthew Weir—Assistant Inspector General for Audit, Compliance, and Enforcement Operations.

*Department of Veterans Affairs*

Phone Number: (202) 461-4603

CIGIE Liaison—Brandy Beckham (202) 264-9376

David Case—Deputy Inspector General.

John D. Daigh—Assistant Inspector General for Healthcare Inspections.

Julie Kroviak—Deputy Assistant Inspector General for Healthcare Inspections.

Melanie Krause—Assistant Inspector General for Management and Administration.

Gopala Seelamneni—Deputy Assistant Inspector General for Management and Administration/Chief Technology Officer.

Tara Porter—Deputy Assistant Inspector General for Management and Administration

Dated: September 11, 2020.

**Shiji S. Thomas,**

*Chair, CIGIE Oversight.gov Subcommittee/Forensic Accounting Manager, NSF OIG.*

[FR Doc. 2020-20959 Filed 9-22-20; 8:45 am]

**BILLING CODE 6820-C9-P**

## DEPARTMENT OF DEFENSE

### Department of the Army

#### Environmental Impact Statement for Army Training Land Retention at Pōhakuloa Training Area in Hawai'i; Correction

**AGENCY:** Department of the Army; Defense (DOD).

**ACTION:** Notice of intent; correction.

**SUMMARY:** The Department of the Army (Army) published a document in the **Federal Register** of September 4, 2020, concerning its continuing intent to prepare an Environmental Impact Statement to address the Army's proposed retention of up to approximately 23,000 acres of land currently leased to the Army by the state of Hawai'i ("State-owned land") at Pōhakuloa Training Area (PTA) on the island of Hawai'i. The document referenced two in-person comment stations previously associated with the Virtual Scoping Open House to be held Wednesday, September 23, 2020. Now, however, because of the national and local orders and proclamations in response to the coronavirus (COVID-19) pandemic in the United States, including: The County of Hawai'i Mayor's COVID-19 Emergency Rule No. 11 dated August 25, 2020, and the Office of the Governor, State of Hawaii Office Twelfth Proclamation Related to the COVID-19 Emergency dated August 20, 2020, the Army is canceling the in-person comment stations. Only the in-person comment stations will be cancelled; the EIS Scoping Virtual Open House will be held as planned.

**FOR FURTHER INFORMATION CONTACT:** Mr. Michael Donnelly, PTA Public Affairs Officer, at [michael.o.donnelly.civ@mail.mil](mailto:michael.o.donnelly.civ@mail.mil) or (808) 969-2411.

#### SUPPLEMENTARY INFORMATION:

##### Correction

In the **Federal Register** of September 4, 2020, in FR Doc. 2020-19620, on page 55263, in the third column, correct the **SUPPLEMENTARY INFORMATION** caption to read:

**SUPPLEMENTARY INFORMATION:** PTA has been used for training as early

as 1938, but was not used routinely until 1943. PTA was formally established in 1956 through a maneuver agreement granted by the Territory of Hawai'i. In 1964, the State granted a 65-year lease of approximately 23,000 acres of land to the Army for military purposes. The lease expires on August 16, 2029. The 23,000 acres of State-owned land contain utilities, critical infrastructure, maneuver land, and key training facilities, some of which are not available elsewhere in Hawai'i. The land also provides access to approximately 110,000 acres of adjacent U.S.

Government-owned land at PTA. PTA encompasses approximately 132,000 acres of land used for training military personnel for combat. It is the only U.S. training area in the Pacific region where training units can complete all mission essential tasks, and the only U.S. training facility in the Pacific region that can accommodate larger than company-sized units for livefire and maneuver exercises. The U.S. Army Hawaii (USARHAW) and other U.S. military units that train at PTA include the 25th Infantry Division, U.S. Marine Corps, U.S. Navy, U.S. Air Force, Hawaii National Guard, and U.S. Army Reserve. The Army's retention of State-owned land within PTA is needed to enable USARHAW to continue to conduct military training to meet its current and future training requirements. Retention of State-owned land is needed to allow access between major parcels of U.S. Government-owned land at PTA, retain substantial Army infrastructure investments, allow for future facility and infrastructure modernization, preserve limited maneuver area, provide austere environment training, and maximize use of the impact area in support of USARHAW-coordinated training. To understand the environmental consequences of the decision to be made, the EIS will evaluate the potential direct, indirect, and cumulative impacts of a range of reasonable alternatives that meet the purpose of, and need for, the Proposed Action. Alternatives to be considered, including the no action alternative, are (1) Full Retention, (2) Modified Retention, and (3) Minimum Retention and Access. Other reasonable alternatives raised during the scoping process and capable of meeting the project purpose and need will be considered for evaluation in the EIS. Native Hawaiian organizations; Federal, state, and local agencies; and the public are invited to be involved in the scoping process for the preparation of this EIS by participating in a scoping meeting and/or submitting written comments.

The scoping process will help identify potential environmental impacts and key issues of concern to be analyzed in the EIS. Written comments must be sent within 40 days of publication of the Notice of Intent in the **Federal Register**. In response to the coronavirus (COVID-19) pandemic in the United States and the Center for Disease Control's recommendations for social distancing and avoiding large public gatherings, the Army will not hold public scoping meetings for this action. In lieu of the public scoping meetings, the Army will use other alternative means to enable public participation such as virtual meetings using online meeting/collaboration tools, teleconference, social media, or email, as appropriate. An EIS Scoping Virtual Open House will be held on Wednesday, September 23, 2020 from 4–9 p.m. During the EIS Scoping Virtual Open House, video presentations can be viewed online at <https://home.army.mil/hawaii/index.php/PTAEIS> and oral and written comments will be accepted. Oral comments will be accepted via phone by calling (808) 300–0220. Notification of the EIS Scoping Virtual Open House date and time will also be published and announced in local news media outlets and on the EIS website. For those who do not have ready access to a computer or the internet, the scoping materials posted to the EIS website will be made available upon request by mail. Inquiries and requests for scoping materials may be made to Michael Donnelly, PTA Public Affairs Officer at (808) 969–2411 or by email at [michael.o.donnelly.civ@mail.mil](mailto:michael.o.donnelly.civ@mail.mil).

**Brenda S. Bowen,**

*Army Federal Register Liaison Officer.*

[FR Doc. 2020–20966 Filed 9–22–20; 8:45 am]

**BILLING CODE 5061–AP–P**

## DEPARTMENT OF DEFENSE

### Office of the Secretary

[Docket ID DoD–2020–OS–0075]

### Proposed Collection; Comment Request

**AGENCY:** National Defense University, DoD.

**ACTION:** Information collection notice.

**SUMMARY:** In compliance with the *Paperwork Reduction Act of 1995*, the National Defense University announces a proposed public information collection and seeks public comment on the provisions thereof. Comments are invited on: Whether the proposed collection of information is necessary

for the proper performance of the functions of the agency, including whether the information shall have practical utility; the accuracy of the agency's estimate of the burden of the proposed information collection; ways to enhance the quality, utility, and clarity of the information to be collected; and ways to minimize the burden of the information collection on respondents, including through the use of automated collection techniques or other forms of information technology.

**DATES:** Consideration will be given to all comments received by November 23, 2020.

**ADDRESSES:** You may submit comments, identified by docket number and title, by any of the following methods:

*Federal eRulemaking Portal:* <http://www.regulations.gov>. Follow the instructions for submitting comments.

*Mail:* DoD cannot receive written comments at this time due to the COVID–19 pandemic. Comments should be sent electronically to the docket listed above.

*Instructions:* All submissions received must include the agency name, docket number and title for this **Federal Register** document. The general policy for comments and other submissions from members of the public is to make these submissions available for public viewing on the internet at <http://www.regulations.gov> as they are received without change, including any personal identifiers or contact information.

**FOR FURTHER INFORMATION CONTACT:** To request more information on this proposed information collection or to obtain a copy of the proposal and associated collection instruments, please write to National Defense University, 300 5th Avenue SW, Building 62, Washington, DC 20319, ATTN: LTC Ann Summers, or call (202) 685–3323.

### SUPPLEMENTARY INFORMATION:

*Title; Associated Form; and OMB Number:* Master's Degree Application Form for International Students; OMB Control Number 0704–XXXX.

*Needs and Uses:* This form is used to collect the information required to admit international students to an NDU master's degree program. The respondents are prospective international students who wish to be admitted to an NDU master's degree program. They respond to this information collection in partial fulfillment of NDU application and admissions requirements. The completed collection instrument is processed by the NDU registrars and a

committee of NDU faculty who review the application in consideration of admission to a master's degree program. The successful effect of this information collection is to satisfy NDU master's degree application requirements for international students so that an admissions decision can be made.

*Affected Public:* Foreign Nationals.

*Annual Burden Hours:* 30 hours.

*Number of Respondents:* 120.

*Responses per Respondent:* 1.

*Annual Responses:* 120.

*Average Burden per Response:* 15 minutes.

*Frequency:* Annually.

*Dated:* September 11, 2020.

**Aaron T. Siegel,**

*Alternate OSD Federal Register Liaison Officer, Department of Defense.*

[FR Doc. 2020–21022 Filed 9–22–20; 8:45 am]

**BILLING CODE 5001–06–P**

## DEPARTMENT OF DEFENSE

### Office of the Secretary

[Docket ID DoD–2020–OS–0076]

### Privacy Act of 1974; System of Records

**AGENCY:** Office of the Secretary of Defense (OSD), Department of Defense (DoD).

**ACTION:** Notice of a modified system of records.

**SUMMARY:** The OSD is modifying a system of records titled “National Language Service Corps (NLSC) Records,” DHRA 07. The NLSC system is a cost-effective solution to the tactical and strategic management of foreign language support needs within the U.S. military and civilian enterprise for operations, plans, and workforce requirements. It provides a surge capability from individuals who are generally unavailable to the Government by tapping into our nation's population of skilled citizens who speak hundreds of languages critical to our nation's needs.

Initially established as a pilot program maintaining a pool of linguists proficient in ten languages, NLSC has since expanded its capabilities to support over 414 languages and dialects and provide over 4,000 man-hours of support to federal agencies annually. To meet the increasing need for professionals with language skills, in 2018, the NLSC expanded the reach of linguist support from DoD organizations to all federal government agencies and is modifying the system to accommodate this growth.

# **Notification for the EIS Preparation Notice**

(State of Hawai'i Office of Environmental Quality Control,  
*The Environmental Notice, September 8, 2020*)





# The Environmental Notice

September 8, 2020

David Y. Ige, Governor

*The Environmental Notice* provides public notice for projects undergoing environmental review in Hawai'i as mandated under Section 343-3, Hawai'i Revised Statutes, the Environmental Impact Statement Law. Along with publishing Environmental Assessments and Environmental Impact Statements for projects in Hawai'i, *The Environmental Notice* also includes other items related to the shoreline, coastal zone, and federal activities.



The ford crossing of the Waimea River on Kaua'i isn't much different today than it was over 100 years ago

Photo from the [Waimea River Ford Crossing Draft EA](#) (Hawai'i State Archives)

## HAWAII

### Army Training Land Retention at Pōhakuloa Training Area (EIS Preparation Notice)

<b>HRS §343-5(a) Trigger</b>	(1) Propose the use of state or county lands or the use of state or county funds (2) Propose any use within any land classified as a conservation district	
<b>District(s)</b>	Hāmākua and North Hilo	
<b>TMK(s)</b>	(3) 4-4-015:008; 4-4-016:005; 7-1-004:007; 3-8-001:013; 3-8-001:022	
<b>Permit(s)</b>	Numerous (see document)	
<b>Approving Agency/ Accepting Authority</b>	Board of Land and Natural Resources, State of Hawai'i Russell Tsuji, DLNR, Land Division, (808) 587-0419, <a href="mailto:dlnr.land@hawaii.gov">dlnr.land@hawaii.gov</a> 1151 Punchbowl St., Room 220, Honolulu, HI 96813	
<b>Applicant</b>	U.S. Army Garrison-Hawaii & U.S. Army Installation Management Command Gregory Wahl, (808) 656-3093, <a href="mailto:Gregory.t.wahl.civ@mail.mil">Gregory.t.wahl.civ@mail.mil</a> for questions, or <a href="mailto:usarmy.hawaii.nepa@mail.mil">usarmy.hawaii.nepa@mail.mil</a> to cc comments U.S. Army Garrison Hawaii Directorate of Public Works - Environmental 948 Santos Dumont Ave., Building 105, 3rd Floor, Wheeler Army Airfield, Schofield Barracks, HI 96857-5013	
<b>Consultant</b>	G70; 111 S. King Street, Suite 170, Honolulu, HI 96813 Jeff Overton, (808) 523-5866, <a href="mailto:ATLR-PTA-EIS@g70.design">ATLR-PTA-EIS@g70.design</a>	
<b>Status</b>	Administrative public review and comment period starts. <b>Comments are due by October 14, 2020.</b> Click the title link above or navigate to <a href="https://home.army.mil/hawaii/index.php/PTAEIS">https://home.army.mil/hawaii/index.php/PTAEIS</a> to access and read the document, then address comments to the approving agency/accepting authority at <a href="http://atlrptaeis.commentinput.com">http://atlrptaeis.commentinput.com</a> and copy the <a href="#">applicant</a> and the <a href="#">consultant</a> . A virtual public scoping meeting will be held on September 23, 2020 4 - 9 p.m; to participate, navigate to <a href="https://home.army.mil/hawaii/index.php/PTAEIS">https://home.army.mil/hawaii/index.php/PTAEIS</a>	

The Pōhakuloa Training Area (PTA) on Hawai'i Island encompasses approximately 133,000 acres of federally-owned and state-owned land. The U.S. Government leases approximately 23,000 acres at PTA from the State. The 65-year lease expires on August 16, 2029. The Army proposes to retain up to 23,000 acres of State-owned land in support of continued military training. The retention will preserve access between major parcels of U.S. Government-owned land in PTA, retain substantial Army infrastructure investments, and allow for future facility and infrastructure modernization. Loss of this land would substantially impact the ability of the Army to meet training requirements and mission of readiness. The Proposed Action does not involve new training, construction, or resource management activities at PTA. Instead, it is a real estate action that would enable continued military use of the land. A Notice of Intent for this action has also [been published](#) in the Federal Register.

### Hilo Scrap Metal Yard Closure and Remediation--Final EA (FONSI)

<b>HRS §343-5(a) Trigger</b>	(1) Propose the use of state or county lands or the use of state or county funds	
<b>District(s)</b>	South Hilo	
<b>TMK(s)</b>	(3) 2-1-013:150 (por.)	
<b>Permit(s)</b>	Numerous (see document)	
<b>Proposing/ Determining Agency</b>	Department of Environmental Management, County of Hawai'i Gene Quiamas, (808) 961-8270, <a href="mailto:Gene.Quiamas@hawaiicounty.gov">Gene.Quiamas@hawaiicounty.gov</a> 345 Kekūānō'a Street, Suite 41, Hilo, HI 96720	
<b>Consultant</b>	Wilson Okamoto Corporation; 1907 S. Beretania Street, Suite 400, Honolulu, HI 96826 Rebecca Candilasa, (808) 946-2277, <a href="mailto:rcandilasa@wilsonokamoto.com">rcandilasa@wilsonokamoto.com</a>	
<b>Status</b>	Finding of No Significant Impact (FONSI) determination	

The County of Hawai'i Department of Environmental Management is planning to permanently close and remediate the site of the former Hilo Scrap Metal Yard located in Hilo on Hawai'i Island. The proposed action consists of excavating and disposing of all waste materials and all lead contaminated soils in the project area. As an alternative, DEM is also analyzing the cost benefits of only disposing of excavated non-recyclable waste materials and consolidating the lead-contaminated soils onsite, grading to optimize future use, and capping with an engineered cover system to prevent direct contact exposure to the lead-contaminated soil. Other activities may include conducting site assessments, post-excavation confirmation sampling, grading, backfilling portions of the site with clean aggregate, and vegetating. Once the site has been remediated, DEM plans to use the site in the future for consolidation of existing solid waste management program components in the area.

**Affidavit of Publication  
for Scoping Public Notices**



AFFIDAVIT OF PUBLICATION

IN THE MATTER OF  
PUBLIC NOTICE

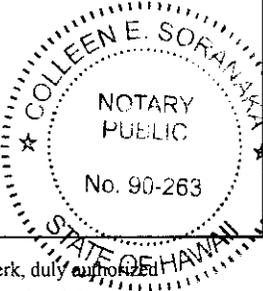
STATE OF HAWAII )  
 ) SS.  
City and County of Honolulu )

Doc. Date: \_\_\_\_\_ # Pages: 1

Notary Name: COLLEEN E. SORANAKA First Judicial Circuit

Doc. Description: Affidavit of Publication

*[Signature]*  
Notary Signature \_\_\_\_\_ Date \_\_\_\_\_



Lisa Sakakida being duly sworn, deposes and says that she is a clerk, duly authorized to execute this affidavit of Oahu Publications, Inc. publisher of The Honolulu Star-Advertiser, MidWeek, The Garden Island, West Hawaii Today, and Hawaii Tribune-Herald, that said newspapers are newspapers of general circulation in the State of Hawaii, and that the attached notice is true notice as was published in the

- Honolulu Star-Advertiser 3 times on:  
09/06, 09/14, 09/20/2020
- MidWeek 0 times on:
- The Garden Island 0 times on:
- Hawaii Tribune-Herald 3 times on:  
09/06, 09/14, 09/20/2020
- West Hawaii Today 3 times on:  
09/06, 09/14, 09/20/2020
- Other Publications: 0 times on:

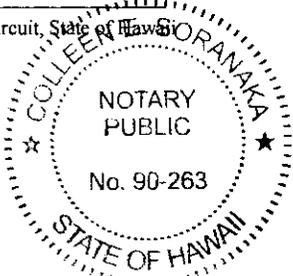
And that affiant is not a party to or in any way interested in the above entitled matter.

*[Signature]*  
\_\_\_\_\_  
Lisa Sakakida

Subscribed to and sworn before me this 22nd day of September A.D. 2020

Colleen E. Soranaka, Notary Public of the First Judicial Circuit, State of Hawaii  
My commission expires: Jan 06 2024

Ad # 0001292078



**U.S. Army to Prepare Environmental Impact Statement for Army Training Land Retention at Pohakuloa Training Area on Hawaii Island**

In accordance with the National Environmental Policy Act (NEPA) and the Hawaii Environmental Policy Act (HEPA), the Department of the Army (Army) announces its intent to prepare an Environmental Impact Statement (EIS) to address the Army's proposed retention of up to approximately 23,000 acres of land currently leased to the Army by the State of Hawaii ("State-owned land") at Pohakuloa Training Area (PTA) on the island of Hawaii. The EIS will be a joint NEPA-HEPA document as the proposed retention involves State-owned land; therefore, the public scoping processes will run concurrently and will jointly meet NEPA and HEPA requirements.

The Army invites public comments on the scope of the EIS during a 40-day public scoping period beginning Sept. 4, 2020. Comments can be submitted on the EIS website: <https://home.army.mil/hawaii/index.php/PTAEIS>, as well as emailed to [usarmy.hawaii.nepa@mail.mil](mailto:usarmy.hawaii.nepa@mail.mil), or mailed to: ATLR PTA EIS Comments, P.O. Box 3444, Honolulu, HI 96801-3444. All comments must be postmarked or submitted by October 14, 2020, to be considered in preparation of the EIS.

The public is invited to participate in an online scoping open house Sept. 23, 2020, to take place on the project website: <https://home.army.mil/hawaii/index.php/PTAEIS>. During the virtual open house participants can:  
1) View online presentations.  
2) Call (808) 300-0220 to submit oral comments from 4 p.m. - 9 p.m. (Sept. 23 only).

For more information or accessibility requests, please contact Mr. Michael Donnelly, PTA Public Affairs Officer, at [michael.o.donnelly.ch@mail.mil](mailto:michael.o.donnelly.ch@mail.mil) or (808) 969-2411.  
(WHT/HTH/SA1292078 9/6, 9/14, 9/20/20)

ICSP NO.: \_\_\_\_\_



# **Draft EIS Notices**

**Notice of Availability**

**Notification for the Draft EIS**

**Affidavit of Publication for Draft EIS Public Notices**



# **Notice of Availability**

**(Office of the Federal Register, *Federal Register*, April 8, 2022)**



direct that notice of this conference be published in the **Federal Register**. 16 CFR 1025.21(b) (2022).



Michael G. Young

#### Distribution

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Alberta E. Mills, U.S. Consumer Product Safety Commission, 4330 East West Highway, Bethesda, MD 20814, [amills@cpsc.gov](mailto:amills@cpsc.gov)

[FR Doc. 2022-07550 Filed 4-7-22; 8:45 am]

BILLING CODE 6355-01-P

## DEPARTMENT OF DEFENSE

### Department of the Army

#### Draft Environmental Impact Statement Regarding Army Training Land Retention at Pōhakuloa Training Area in Hawai'i

**AGENCY:** Department of the Army, DoD.

**ACTION:** Notice of availability.

**SUMMARY:** The Department of the Army (Army) announces the availability of a Draft Environmental Impact Statement (Draft EIS) regarding its Proposed Action—*i.e.*, the Army's retention of up

to approximately 23,000 acres of land the Army presently leases from the State of Hawai'i. This land is located at Pōhakuloa Training Area (PTA) on the island of Hawai'i. In accordance with the National Environmental Policy Act (NEPA) and the Hawai'i Environmental Policy Act (HEPA), the Draft EIS analyzes the potential direct, indirect, and cumulative impacts of a range of reasonable alternatives that meet the purpose of and need for the Proposed Action. The Draft EIS also analyzes the potential impacts of the No-Action Alternative, under which Army use of the land would cease altogether when the lease runs out in 2029. Because the proposed retention involves state-owned land, the EIS is a joint NEPA-HEPA document. Therefore, the public review process runs concurrently and meets NEPA and HEPA requirements.

**DATES:** The Army invites public comments on the Draft EIS during the 60-day public comment period, which begins April 8, 2022, and ends June 7, 2022. To be considered in the Final EIS, all comments must be postmarked or received by 11:59 p.m. Hawai'i Standard Time on June 7, 2022. Public meetings will be held in April 2022 to provide information on the Draft EIS and to enhance the opportunity for public input. Public meetings will be held in accordance with current COVID-19 restrictions. Information regarding how to participate in Draft EIS public meetings and how to submit comments is available on the EIS website: <https://home.army.mil/hawaii/index.php/PTAEIS>.

**ADDRESSES:** Written comments should be submitted through the EIS website (<https://home.army.mil/hawaii/index.php/PTAEIS>), emailed to [atlr-ptaeis@g70.design](mailto:atlr-ptaeis@g70.design), mailed to ATLR PTA EIS Comments, P.O. Box 3444, Honolulu, HI 96801-3444, or provided during public meetings. Comments must be postmarked or received by June 7, 2022.

**FOR FURTHER INFORMATION CONTACT:** Mr. Michael Donnelly, Public Affairs Officer, by telephone at (808) 656-3160 or by email at [michael.o.donnelly.civ@army.mil](mailto:michael.o.donnelly.civ@army.mil).

**SUPPLEMENTARY INFORMATION:** During World War II, the U.S. Marine Corps trained on the land now known as PTA. A 1956 maneuver agreement between the Territory of Hawai'i and the Army formally established PTA. In 1964, the State of Hawai'i granted the Army a 65-year lease of approximately 23,000 acres of land adjacent to PTA for military purposes. Utilities, critical infrastructure, maneuver area, and key

training facilities now sit on this tract of leased land. Some of these human-made features are not available elsewhere in Hawai'i. The parcel also provides access between the PTA cantonment area and approximately 84,000 acres of adjacent, federally owned land at PTA.

The Draft EIS evaluates the potential impacts of a range of alternatives: (1) Full Retention (of approximately 23,000 acres); (2) Modified Retention (of approximately 19,700 acres); (3) Minimum Retention and Access (of approximately 10,100 acres and 11 miles of roads and training trails); and (4) No-Action Alternative (under which the lease lapses in 2029 and the Army loses access to the land).

The Draft EIS analyzes land use, biological resources, cultural resources, hazardous and toxic materials/wastes, air quality, greenhouse gases, noise, geology, topography, soils, water resources, socioeconomic, environmental justice, transportation, traffic, airspace, electromagnetic spectrum, utilities, human health, and safety.

The Draft EIS indicates that under Alternatives 1, 2, and 3, continued public access restrictions on land used for traditional and customary practices will result in significant but mitigable adverse impacts to cultural resources. These significant impacts can be mitigated through appropriate consultation with Native Hawaiians and/or other interested groups. Impacts can also be mitigated through provision of public access to promote and protect cultural beliefs, practices, and resources. Impacts to other resources are less than significant for all action alternatives. The No-Action Alternative would have significant adverse impacts on biological resources, socioeconomic, and utilities.

The Army distributed the Draft EIS to Native Hawaiian organizations, to federal, state, and local agencies/officials, and to other key stakeholders. The Draft EIS and related information are available on the EIS website at: <https://home.army.mil/hawaii/index.php/PTAEIS>. The public may also review the Draft EIS and select materials at the following libraries:

1. Hawai'i State Library, Hawai'i Documents Center, 478 S King Street, Honolulu, HI 96813
2. Hilo Public Library, 300 Waiianuenue Avenue, Hilo, HI 96720
3. Kailua-Kona Public Library, 75-138 Hualalai Road, Kailua-Kona, HI 96740
4. Thelma Parker Memorial Public and School Library, 67-1209 Mamalahoa Highway, Kamuela, HI 96743

Native Hawaiian organizations, federal, state, and local agencies/

officials, and other interested entities/individuals are encouraged to comment on the Draft EIS during the 60-day public comment period. All timely comments will be considered in the development of the Final EIS.

**James W. Satterwhite,**  
Army Federal Register Liaison Officer.

[FR Doc. 2022-07615 Filed 4-7-22; 8:45 am]

BILLING CODE 3711-02-P

## DEPARTMENT OF DEFENSE

### Defense Acquisition Regulations System

#### Early Engagement Opportunity: Implementation of National Defense Authorization Act for Fiscal Year 2022

**AGENCY:** Defense Acquisition Regulations System, Department of Defense (DoD).

**ACTION:** Notice.

**SUMMARY:** DoD announces an early engagement opportunity regarding implementation of the National Defense Authorization Act for Fiscal Year 2022 within the acquisition regulations.

**DATES:** Early inputs should be submitted in writing via the Defense Acquisition Regulations System (DARS) website shown below. The website will be updated when early inputs will no longer be accepted.

**ADDRESSES:** Submit early inputs via the DARS website at [https://www.acq.osd.mil/dpap/dars/early\\_engagement.html](https://www.acq.osd.mil/dpap/dars/early_engagement.html). Send inquiries via email to [osd.dfars@mail.mil](mailto:osd.dfars@mail.mil) and reference "Early Engagement Opportunity: Implementation of NDAA for FY 2022" in the subject line.

**FOR FURTHER INFORMATION CONTACT:** Jennifer D. Johnson, telephone 703-717-8226.

**SUPPLEMENTARY INFORMATION:** DoD is providing an opportunity for the public to provide early inputs on implementation of the National Defense Authorization Act (NDAA) for Fiscal Year (FY) 2022 within the acquisition regulations. The public is invited to submit early inputs on sections of the NDAA for FY 2022 via the DARS website at [https://www.acq.osd.mil/dpap/dars/early\\_engagement.html](https://www.acq.osd.mil/dpap/dars/early_engagement.html). The website will be updated when early inputs will no longer be accepted. Please note, this venue does not replace or circumvent the rulemaking process. DARS will engage in formal rulemaking, in accordance with 41 U.S.C. 1707, when it has been determined that rulemaking is required to implement a

section of the NDAA for FY 2022 within the acquisition regulations.

**Authority:** DoD Instruction 5000.35, Defense Acquisition Regulations (DAR) System.

**Jennifer D. Johnson,**  
Editor/Publisher, Defense Acquisition Regulations System.

[FR Doc. 2022-07546 Filed 4-7-22; 8:45 am]

BILLING CODE 5001-06-P

## DEPARTMENT OF ENERGY

### Agency Information Collection Extension

**AGENCY:** U.S. Department of Energy.

**ACTION:** Notice of request for comments.

**SUMMARY:** The Department of Energy (DOE) invites public comment on a proposed collection of information that DOE is developing for submission to the Office of Management and Budget (OMB) pursuant to the Paperwork Reduction Act of 1995.

**DATES:** Comments regarding this proposed information collection must be received on or before June 7, 2022. If you anticipate any difficulty in submitting comments within that period, contact the person listed in the **FOR FURTHER INFORMATION CONTACT** section as soon as possible.

**ADDRESSES:** Written comments may be sent by email to [haleusurvey@hq.doe.gov](mailto:haleusurvey@hq.doe.gov).

**FOR FURTHER INFORMATION CONTACT:** Michael Reim, [michael.reim@nuclear.energy.gov](mailto:michael.reim@nuclear.energy.gov), 202-748-3383.

**SUPPLEMENTARY INFORMATION:** Comments are invited on: (a) Whether the extended collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility; (b) the accuracy of the agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions used; (c) ways to enhance the quality, utility, and clarity of the information to be collected; and (d) ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques or other forms of information technology.

This information collection request contains:

- (1) *OMB No.:* 1910-New.
- (2) *Information Collection Request Titled:* Survey of High-Assay, Low-Enriched Uranium (HALEU) Needs for Civilian Domestic Research,

Development, Demonstration, and Commercial Use.

(3) *Type of Review:* New.

(4) *Purpose:* The purpose of this survey is to inform the planning and development of a Department of Energy (DOE) HALEU Availability Program. Section 2001 of The Energy Act of 2020 (Pub. L. 116-260, Dec. 27, 2020) directs the Secretary to establish and carry out, through the Office of Nuclear Energy (NE), a program to support the availability of HALEU for civilian domestic research and development, demonstration, and commercial use. The Act directs multiple actions to facilitate the development of a commercial HALEU supply chain including establishing a consortium of fuel cycle entities to partner with DOE in making HALEU available, and to provide HALEU to consortium members during development of commercial domestic sources. NE is developing plans to establish the HALEU Availability Program to implement these and other directed actions, including those related to HALEU fuel fabrication, enrichment, and transportation.

(5) *Annual Estimated Number of Respondents:* 50.

(6) *Annual Estimated Number of Total Responses:* 50.

(7) *Annual Estimated Number of Burden Hours:* 4.

(8) *Annual Estimated Reporting and Recordkeeping Cost Burden:* \$350.

*Statutory Authority:* Section 2001 of The Energy Act of 2020 (Pub. L. 116-260, Dec. 27, 2020).

### Signing Authority

This document of the Department of Energy was signed on April 4, 2022, by Sal J. Golub, Acting Deputy Assistant Secretary for Nuclear Fuel Cycle and Supply Chain, Office of Nuclear Energy, pursuant to delegated authority from the Secretary of Energy. That document with the original signature and date is maintained by DOE. For administrative purposes only, and in compliance with requirements of the Office of the Federal Register, the undersigned DOE Federal Register Liaison Officer has been authorized to sign and submit the document in electronic format for publication, as an official document of the Department of Energy. This administrative process in no way alters the legal effect of this document upon publication in the **Federal Register**.

Signed in Washington, DC, on April 5, 2022.

**Treena V. Garrett,**  
Federal Register Liaison Officer, U.S. Department of Energy.

[FR Doc. 2022-07545 Filed 4-7-22; 8:45 am]

BILLING CODE 6450-01-P

# **Notification for the Draft EIS**

**(State of Hawai'i Office of Environmental Quality Control,  
*The Environmental Notice, April 8, 2022*)**





# The Environmental Notice

April 8, 2022

David Y. Ige, Governor  
Mary Alice Evans, Director

*The Environmental Notice* provides public notice for projects undergoing environmental review in Hawai'i as mandated under Section 343-3, Hawai'i Revised Statutes, the Environmental Impact Statement Law. Along with publishing Environmental Assessments and Environmental Impact Statements for projects in Hawai'i, *The Environmental Notice* also includes other items related to the shoreline, coastal zone, and federal activities.



The U.S. Army is proposing to retain the use of the State-owned portion of Pōhakuloa Training Area on the Big Island for continued military training

Photo from the [Draft EIS for the project](#)

## HAWAII

[Army Training Land Retention at Pōhakuloa Training Area--Draft EIS Vol I, Vol II and scoping meeting comments](#)

<b>HRS §343-5(a) Trigger</b>	(1) Propose the use of state or county lands or the use of state or county funds (2) Propose any use within any land classified as a conservation district
<b>District(s)</b>	Hawai'i-multiple
<b>TMK(s)</b>	(3) 4-4-015:008; 4-4-016:005; 7-1-004:007; 3-8-001:013 & 022
<b>Permit(s)</b>	Numerous (see document)
<b>Approving Agency</b>	State of Hawai'i, Department of Land and Natural Resources Russell Tsuji, (808) 587-0419, <a href="mailto:dlnr.land@hawaii.gov">dlnr.land@hawaii.gov</a>
<b>Applicant</b>	U.S. Army Garrison-Hawaii Michael Donnelly, (808) 656-3160, <a href="mailto:usarmy.hawaii.nepa@army.mil">usarmy.hawaii.nepa@army.mil</a> U.S. Army Garrison Hawaii, Directorate of Public Works - Environmental 948 Santos Dumont Avenue, Building 105, 3rd Floor, Wheeler Army Airfield, Schofield Barracks, HI 96857-5013
<b>Consultant</b>	G70; 111 S. King Street, Suite 170, Honolulu, HI 96813 Jeff Overton, (808) 523-5866, <a href="mailto:ATLR-PTA-EIS@g70.design">ATLR-PTA-EIS@g70.design</a>
<b>Status</b>	Statutory public review and comment period starts. Pursuant to HRS Chapter 343 ("HEPA"), the 45-day comment period runs through May 23, 2022; however, since this is a joint HEPA-NEPA document, <b>the Applicant will accept comments through June 7, 2022</b> . Please send comments to the approving agency at <a href="http://atlrptaeis.commentinput.com">http://atlrptaeis.commentinput.com</a>

The Pōhakuloa Training Area (PTA) on Hawai'i Island encompasses approximately 132,000 acres of U.S. Government-owned and State-owned land. The U.S. Government leases approximately 23,000 acres at PTA from the State of Hawai'i. The 65-year lease expires on August 16, 2029. The Army proposes to retain up to 23,000 acres of State-owned land in support of continued military training. The retention will preserve maneuver area, provide austere environment training, enable access between major parcels of U.S. Government-owned land, retain infrastructure investments, allow for future modernization, and maximize use of the impact area. Loss of this land would impact the ability of the Army to meet training requirements and its mission of readiness. The Proposed Action is a real estate action that would enable continuation of ongoing activities. It does not include construction or changes in ongoing activities. A Notice of Availability for this action will be published in the Federal Register.

[Hilo Abandoned Vehicle Facility--Draft EA \(AFNSI\)](#)

<b>HRS §343-5(a) Trigger</b>	(1) Propose the use of state or county lands or the use of state or county funds
<b>District(s)</b>	South Hilo
<b>TMK(s)</b>	(3) 2-1-013:167 (portion)
<b>Permit(s)</b>	Various (see document)
<b>Proposing/Determining Agency</b>	County of Hawai'i, Department of Environmental Management Gene Quiamas, (808) 961-8270, <a href="mailto:Gene.Quiamas@hawaiicounty.gov">Gene.Quiamas@hawaiicounty.gov</a> 345 Kekūānāo'a Street, Suite 41, Hilo, HI 96720
<b>Consultant</b>	Wilson Okamoto Corporation; 1907 South Beretania Street, Suite 400, Honolulu, HI 96826 Rebecca Candilasa, (808) 946-2277, <a href="mailto:rcandilasa@wilsonokamoto.com">rcandilasa@wilsonokamoto.com</a>
<b>Status</b>	Statutory 30-day public review and comment period starts. <b>Comments are due by May 9, 2022</b> . Please click on title link above to read the document, then send comments to the proposing/determining agency and copy the consultant.

The County of Hawai'i, Department of Environmental Management (DEM) is proposing to improve the existing abandoned vehicle impound lot located next to the East Hawai'i Regional Sort Station (EHRSS) in Hilo. The Proposed Action consists of constructing a 5,000-sf single story, pre-engineered metal building that would store about 25 "auctionable" vehicles with additional space for 4 staff offices, a reception area, restrooms, a conference/lunchroom, and other administrative support spaces. The existing AV lot would be expanded to hold about 100 impounded vehicles and would include parking spaces for staff and visitor vehicles. Other proposed site improvements include a paved access driveway, additional pavement for the expanded vehicle lot, a new water line and other utility connections, an individual wastewater system, an on-site drainage system, additional security fencing for the expanded lot, and a surveillance system.

**Affidavit of Publication for  
Draft EIS Public Notices**



AFFIDAVIT OF PUBLICATION

IN THE MATTER OF
PUBLIC NOTICE - U.S. Army Publishes Draft EIS for Army Training

STATE OF HAWAII
City and County of Honolulu

Doc. Date: APR 25 2022 # Pages: 1
Notary Name: COLLEEN E. SORANAKA First Judicial Circuit
Doc. Description: Affidavit of Publication
Notary Signature: [Signature] Date: APR 25 2022
Notary Seal: COLLEEN E. SORANAKA NOTARY PUBLIC No. 90-263 STATE OF HAWAII

Lisa Sakakida being duly sworn, deposes and says that she is a clerk, duly authorized to execute this affidavit of Oahu Publications, Inc. publisher of The Honolulu Star-Advertiser, MidWeek, The Garden Island, West Hawaii Today, and Hawaii Tribune-Herald, that said newspapers are newspapers of general circulation in the State of Hawaii, and that the attached notice is true notice as was published in the

Honolulu Star-Advertiser 3 times on: 04/08, 04/22, 04/24/2022
MidWeek 0 times on:
The Garden Island 0 times on:
Hawaii Tribune-Herald 3 times on: 04/08, 04/22, 04/24/2022
West Hawaii Today 3 times on: 04/08, 04/22, 04/24/2022
Other Publications: 0 times on:

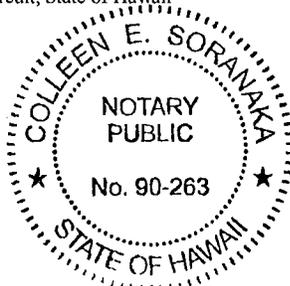
And that affiant is not a party to or in any way interested in the above entitled matter.

[Signature]
Lisa Sakakida

Subscribed to and sworn before me this 25th day of April A.D. 2022

Colleen E. Soranaka, Notary Public of the First Judicial Circuit, State of Hawaii
My commission expires: Jan 06 2024

Ad # 0001366483



ICSP NO.: \_\_\_\_\_

U.S. Army Publishes Draft Environmental Impact Statement for Army Training Land Retention at Pöhakuloa Training Area on Hawa'i Island

In accordance with the National Environmental Policy Act (NEPA) and the Hawa'i Environmental Policy Act (HEPA), the Department of the Army (Army) published a Draft Environmental Impact Statement (EIS) to analyze the Army's proposed retention of up to approximately 23,000 acres of land currently leased to the Army by the State of Hawa'i ("State-owned land") at Pöhakuloa Training Area (PTA) on the Island of Hawa'i. The public comment periods will run concurrently to meet both NEPA and HEPA requirements.

The Army invites public comments on the Draft EIS during a 60-day public comment period beginning April 8, 2022. The Draft EIS and public meeting materials are available on the EIS website: https://home.army.mil/hawaii/index.php/PTAEIS. Comments can be submitted on the EIS website, emailed to: ATLR-PTA-EIS@g70.design, or mailed to: ATLR PTA EIS Comments, P.O. Box 3444, Honolulu, HI 96801-3444. To be considered in the Final EIS, all comments must be postmarked or email dated by 11:59 p.m. Hawa'i Standard Time on June 7, 2022.

The public is invited to attend Draft EIS public meetings on the following dates and times on the Island of Hawa'i.

- 1. 'Imiloa Astronomy Center, April 25, 2022 from 6-8 PM
2. Wai'aleale District Park, April 26, 2022 from 6-8 PM

The public will have the option to watch the Draft EIS public meetings through a live video stream that can be accessed on the EIS website. For more information on the Draft EIS public meetings, please visit the project website at: https://home.army.mil/hawaii/index.php/PTAEIS.

For more information or accessibility requests, please contact Mr. Michael Donnelly, Public Affairs Officer, at michael.o.donnelly.civ@army.mil or (808) 656-3160. (SA/HTH/WHT1366483 4/8, 4/22, 4/24/22)



# **Second Draft EIS Notices**

**Notice of Availability**

**Notification for the Second Draft EIS**

**Affidavit of Publication for the Second Draft EIS Public Notices**



# **Notice of Availability**

(Office of the Federal Register, *Federal Register*, April 19, 2024)



information from Government personnel and relevant comments from interested parties regarding the Committee's intent to geographically limit this services requirement.

The following product(s) and service(s) are proposed for addition to the Procurement List for production by the nonprofit agencies listed:

*Product(s)*

*NSN(s)—Product Name(s):*

700005401N—Monitor, Desktop, 23.8"  
*Authorized Source of Supply:* Goodwill  
 Vision Enterprises, Rochester, NY  
*Contracting Activity:* DEFENSE LOGISTICS  
 AGENCY, DLA TROOP SUPPORT  
*Distribution:* B-List  
*Mandatory for:* Total Government  
 Requirement

*Service(s)*

*Service Type:* Custodial  
*Mandatory for:* US Geological Survey, Earth  
 Resources Observation Science (EROS)  
 Center, Sioux Falls, SD  
*Authorized Source of Supply:* Northwest  
 Center, Seattle, WA  
*Contracting Activity:* US GEOLOGICAL  
 SURVEY, US GEOLOGICAL SURVEY  
*Service Type:* Base Information Transfer  
 Center & Postal Service, Mail  
 Distribution Service  
*Mandatory for:* US Army, Central Mail  
 Facility, Redstone Arsenal, Huntsville,  
 AL  
*Authorized Source of Supply:* Huntsville  
 Rehabilitation Foundation, Inc.,  
 Huntsville, AL  
*Contracting Activity:* DEPT OF THE ARMY,  
 W6QK ACC-RSA

**Deletions**

The following product(s) and service(s) are proposed for deletion from the Procurement List:

*Product(s)*

*NSN(s)—Product Name(s):*

9930-00-NIB-0105—Kit, Post Mortem Bag,  
 Basic, Straight Zipper, 36" x 90"  
 9930-00-NIB-0106—Kit, Post Mortem Bag,  
 Basic, Curved Zipper, 36" x 90"  
 9930-00-NIB-0107—Kit, Post Mortem Bag,  
 Heavy Duty, 36" x 90"  
 9930-00-NIB-0108—Kit, Post Mortem Bag,  
 Heavy Duty, XL, 72" x 90"  
 9930-00-NIB-0109—Kit, Disaster Bag with  
 ID Tags, 34" x 96"  
*Authorized Source of Supply:* BOSMA  
 Enterprises, Indianapolis, IN  
*Contracting Activity:* DLA TROOP SUPPORT,  
 PHILADELPHIA, PA

*Service(s)*

*Service Type:* Grounds Maintenance Service  
*Mandatory for:* Joint Interagency Task Force  
 South, Truman Annex, Key West, FL  
*Authorized Source of Supply:* Goodwill  
 Industries of South Florida, Inc., Miami,  
 FL  
*Contracting Activity:* DEPT OF THE ARMY,

W453 JIATFS

**Michael R. Jurkowski,**

*Director, Business Operations.*

[FR Doc. 2024-08416 Filed 4-18-24; 8:45 am]

**BILLING CODE 6353-01-P**

**DEPARTMENT OF DEFENSE**

**Department of the Army**

**Second Draft Environmental Impact Statement for Army Training Land Retention at Pōhakuloa Training Area in Hawai'i**

**AGENCY:** Department of the Army, DOD.

**ACTION:** Notice of availability.

**SUMMARY:** The Department of the Army (Army) announces the availability of a Second Draft Environmental Impact Statement (Draft EIS) regarding its proposed action to retain up to approximately 22,750 acres of the 23,000 acres of land the Army currently leases from the State of Hawai'i ("State-owned land") at Pōhakuloa Training Area (PTA) on the island of Hawai'i. The Army is publishing the Draft EIS for public review during a 45-day comment period. In accordance with the National Environmental Policy Act (NEPA) and the Hawai'i Environmental Policy Act (HEPA), the Draft EIS analyzes the potential direct, indirect, and cumulative impacts of a range of reasonable alternatives that meet the purpose of, and need for, the proposed action. Because the proposed action involves State-owned land, the EIS is a joint NEPA-HEPA document; therefore, the public review process runs concurrently and meets both NEPA and HEPA requirements.

**DATES:** The Army invites public comments on the Draft EIS during the 45-day public comment period. To be considered in the Final EIS, all comments must be postmarked or received by 11:59 p.m. Hawai'i standard time on June 7, 2024. Public meetings will be held in Waimea District Park on May 6, 2024, and at the 'Imiloa Astronomy Center on May 7, 2024 to provide information on the Draft EIS and to enhance the opportunity for public comment. Information on how to participate in the Draft EIS public meetings and how to submit comments is available on the EIS website at <https://home.army.mil/hawaii/index.php/PTAEIS>.

**ADDRESSES:** Written comments should be submitted through the EIS website at <https://home.army.mil/hawaii/index.php/PTAEIS>, emailed to [atlr-pta-eis@g70.design](mailto:atlr-pta-eis@g70.design), mailed to ATLR PTA

EIS Comments, P.O. Box 3444, Honolulu, HI 96801-3444, or provided during the public meetings. Comments must be postmarked or received by June 7, 2024.

**FOR FURTHER INFORMATION CONTACT:** U.S. Army Garrison-Hawaii, Mr. Michael Donnelly, Public Affairs Office, by telephone at (808) 787-2140 or by email at [usarmy.hawaii.nepa@army.mil](mailto:usarmy.hawaii.nepa@army.mil).

**SUPPLEMENTARY INFORMATION:** During World War II, the U.S. Marine Corps trained on the land now known as PTA. A 1956 maneuver agreement between the Territory of Hawai'i and the Army formally established PTA. In 1964, the State of Hawai'i granted the Army a 65-year lease of approximately 23,000 acres of land adjacent to PTA for military purposes. The State-owned land now contains utilities, critical infrastructure, maneuver area, and key training facilities, some of which are not available elsewhere in Hawai'i. The parcel also provides access among the PTA cantonment area and Bradshaw Army Airfield and two other federally owned parcels at PTA.

The Army made a Draft EIS available for comment on this action on April 8, 2022. In response to comments received from agencies and the public on that Draft EIS, the Army is no longer considering the retention of approximately 250 acres of State-owned land administered by the Department of Hawaiian Home Lands. In addition to analyzing impacts of a fee simple retention method, the new Draft EIS also assesses impacts of a lease retention method. Due to these changes, the Army determined that another draft EIS should be made available for public comment.

The Draft EIS evaluates the potential impacts of a range of reasonable alternatives: (1) Maximum Retention (of approximately 22,750 acres); (2) Modified Retention (of approximately 19,700 acres); and (3) Minimum Retention and Access (of approximately 10,100 acres and 11 miles of roads and training trails). The Draft EIS also analyzes the potential impacts of the No Action Alternative, under which Army use of the land would cease altogether when the lease expires in 2029. The Army has identified Alternative 2, Modified Retention, as the Preferred Alternative. The Army based its preference on: public comments; environmental, social, technical, and economic considerations; and the ability of the alternative to meet the mission of the Army.

The Draft EIS analyzes: land use; biological resources; historic and cultural resources and cultural

practices; hazardous substances and hazardous wastes; air quality and greenhouse gases; noise; geology, topography, and soils; water resources; socioeconomic; environmental justice; transportation and traffic; airspace; electromagnetic spectrum; utilities; and human health and safety.

The Draft EIS indicates that under Alternatives 1, 2, and 3, significant adverse impacts on land use (land tenure), cultural practices, and environmental justice could occur. Under the No Action Alternative, significant adverse impacts on biological resources, socioeconomic, and utilities could occur. The No Action Alternative could have significant beneficial impacts on land use, cultural practices, and environmental justice. To mitigate adverse impacts to land use, the Army would consider adding non-barbed wire fencing and signage to minimize encroachment and accidental or intentional trespass from adjacent non-U.S. Government-owned land. In consideration of adverse impacts to cultural practices and environmental justice, the Army, in consultation with Native Hawaiians and cultural practitioners, proposes to: (1) formalize a cultural access request process to enable Native Hawaiians and cultural practitioners to promote and preserve cultural practices, beliefs, and resources; and (2) explore options to provide unlimited access to specific locations. To mitigate adverse impacts on human health and safety, the Army would consider: (1) negotiating an agreement with the State to allow the Army to monitor for wildfires on the State-owned land that is not retained by the Army; and (2) continuing or renegotiating its Memorandum of Agreement with the Hawai'i County Fire Department to assist wildfire responders with wildfire suppression outside of PTA boundaries.

The No Action Alternative could have: significant adverse impacts on biological resources, socioeconomic, and utilities; significant beneficial impacts for land use, cultural practices, and environmental justice; and less than significant impacts on all other resources.

The Army distributed the Draft EIS to: Native Hawaiian Organizations; Federal, State, and local agencies and officials; and other stakeholders. The Draft EIS and informational materials are also available on the EIS website at: <https://home.army.mil/hawaii/index.php/PTAEIS>. The public may also review the Draft EIS and select materials at the following libraries:

1. Hawai'i State Library, Hawai'i Documents

Center, 478 S King Street, Honolulu, HI 96813

2. Hilo Public Library, 300 Waiuanuenue Avenue, Hilo, HI 96720
3. Kailua-Kona Public Library, 75-138 Hualalai Road, Kailua-Kona, HI 96740
4. Thelma Parker Memorial Public and School Library, 67-1209 Mamalahoa Highway, Kamuela, HI 96743

Native Hawaiian Organizations, Federal, State, and local agencies/officials, and other interested entities/individuals are encouraged to comment on the Draft EIS during the 45-day public comment period. All comments postmarked or received June 7, 2024 will be considered in the development of the Final EIS.

**James W. Satterwhite, Jr.,**

*U.S. Army Federal Register Liaison Officer.*

[FR Doc. 2024-08403 Filed 4-18-24; 8:45 am]

**BILLING CODE 3711-02-P**

## DEPARTMENT OF DEFENSE

### Office of the Secretary

#### Department of Defense Wage Committee (DoDWC); Notice of Federal Advisory Committee Meetings

**AGENCY:** Under Secretary of Defense for Personnel and Readiness (USD(P&R)), Department of Defense (DoD).

**ACTION:** Notice of closed Federal Advisory Committee meetings.

**SUMMARY:** The DoD is publishing this notice to announce that the following Federal Advisory Committee meetings of the DoDWC will take place.

**DATES:** Tuesday, April 16, 2024, from 10 a.m. to 1 p.m. and will be closed to the public. Tuesday, April 30, 2024, from 10 a.m. to 11:30 a.m. and will be closed to the public; Tuesday, May 14, 2024, from 10 a.m. to 1 p.m. and will be closed to the public; Tuesday, May 28, 2024, from 10 a.m. to 10:30 a.m. and will be closed to the public; Tuesday, June 11, 2024, from 10 a.m. to 11:30 a.m. and will be closed to the public.

**ADDRESSES:** The closed meetings will be held by Microsoft Teams.

**FOR FURTHER INFORMATION CONTACT:** Mr. Karl Fendt, (571) 372-1618 (voice), [karl.h.fendt.civ@mail.mil](mailto:karl.h.fendt.civ@mail.mil). (email), 4800 Mark Center Drive, Suite 05G21, Alexandria, Virginia 22350 (mailing address). Any agenda updates can be found at the DoDWC's official website: <https://wageandsalary.dcpas.osd.mil/BWN/DODWC/>.

**SUPPLEMENTARY INFORMATION:** Due to circumstances beyond the control of the Designated Federal Officer (DFO) and the DoD, the DoDWC was unable to provide public notification required by

41 CFR 102-3.150(a) concerning its April 16, 2024 meeting. Accordingly, the Advisory Committee Management Officer for the DoD, pursuant to 41 CFR 102-3.150(b), waives the 15-calendar day notification requirement.

Due to circumstances beyond the control of the DFO and the DoD, the DoDWC was unable to provide public notification required by 41 CFR 102-3.150(a) concerning its April 30, 2024 meeting. Accordingly, the Advisory Committee Management Officer for the DoD, pursuant to 41 CFR 102-3.150(b), waives the 15-calendar day notification requirement.

These meetings are being held under the provisions of chapter 10 of title 5, United States Code (U.S.C.) (commonly known as the "Federal Advisory Committee Act" or "FACA"), 5 U.S.C. 552b(c) (commonly known as the "Government in the Sunshine Act"), and 41 CFR 102-3.140 and 102-3.150.

*Purpose of the Meeting:* The purpose of these meetings is to provide independent advice and recommendations on matters relating to the conduct of wage surveys and the establishment of wage schedules for all appropriated fund and non-appropriated fund areas of blue-collar employees within the DoD.

### Agendas

#### April 16, 2024

Opening Remarks by Chair, Mr. Eric Clayton, and DFO, Mr. Karl Fendt.

Reviewing survey results and/or survey specifications for the following Nonappropriated Fund areas:

1. Any items needing further clarification or action from the previous meeting.
2. Wage Schedule (Full Scale) for the Onslow, North Carolina wage area (AC-097).
3. Wage Schedule (Full Scale) for the Shelby, Tennessee wage area (AC-098).
4. Wage Schedule (Full Scale) for the Christian, Kentucky/Montgomery, Tennessee wage area (AC-099).
5. Wage Schedule (Full Scale) for the Charleston, South Carolina wage area (AC-120).
6. Wage Schedule (Full Scale) for the San Juan-Guaynabo, Puerto Rico wage area (AC-155).
7. Wage Schedule (Wage Change) for the Sacramento, California wage area (AC-002).
8. Wage Schedule (Wage Change) for the San Joaquin, California wage area (AC-008).
9. Wage Schedule (Wage Change) for the Bernalillo, New Mexico wage area (AC-019).

# **Notification for the Second Draft EIS**

**(State of Hawai'i Office of Environmental Quality Control,  
*The Environmental Notice, April 23, 2024*)**





# The Environmental Notice

April 23, 2024

Josh Green, M.D., Governor  
Mary Alice Evans, OPSD Director

*The Environmental Notice* provides public notice for projects undergoing environmental review in Hawai'i as mandated under Section 343-3, Hawai'i Revised Statutes, the Environmental Impact Statement Law. Along with publishing Environmental Assessments and Environmental Impact Statements for projects in Hawai'i, *The Environmental Notice* also includes other items related to the shoreline, coastal zone, and federal activities.



Hawaii's rich natural and cultural environment provides many reasons to appreciate Earth Day, every day

Photo credit: Michael Furuya

## HAWAII EAS/EISS

### Army Training Land Retention at Pōhakuloa Training Area--2nd Draft EIS Vol I, II, III, and scoping meeting audio

<b>HRS §343-5(a) Trigger</b>	(1) Propose the use of state or county lands or the use of state or county funds (2) Propose any use within any land classified as a conservation district
<b>District(s)</b>	Hawai'i--multiple
<b>TMK(s)</b>	(3) 4-4-015:008; 4-4-016:005; 7-1-004:007
<b>Permit(s)</b>	Numerous (see document)
<b>Approving Agency</b>	State of Hawai'i, Board of Land and Natural Resources Russell Tsuji, (808) 587-0419, <a href="mailto:dlnr.land@hawaii.gov">dlnr.land@hawaii.gov</a> 1151 Punchbowl Street, Room 220, Honolulu, HI 96813
<b>Applicant</b>	U.S. Army Garrison-Hawai'i & U.S. Army Installation Management Command Matthew Foster, (808) 656-6821, <a href="mailto:matthew.b.foster3.civ@army.mil">matthew.b.foster3.civ@army.mil</a> U.S. Army Garrison-Hawai'i Directorate of Public Works – Environmental Division 948 Santos Dumont Avenue, Building 105, 3rd Floor, Wheeler Army Airfield, HI 96857-5013
<b>Consultant</b>	G70; 111 S. King Street, Suite 170, Honolulu, HI 96813 Jeff Overton, (808) 523-5866, <a href="mailto:ATLR-PTA-EIS@g70.design">ATLR-PTA-EIS@g70.design</a>
<b>Status</b>	Statutory 45-day public review and comment period starts. <b>Comments are due by June 7, 2024.</b> Please send comments to <a href="https://atlrptaais.commentinput.com?id=AZ5WkUQaC">https://atlrptaais.commentinput.com?id=AZ5WkUQaC</a> . The Final EIS must incorporate comments and responses on both Draft EISs, so comments on the original Draft EIS do not need to be resubmitted.

The Pōhakuloa Training Area (PTA) on Hawai'i Island encompasses approximately 132,000 acres of U.S. Government-owned and State-owned land. The U.S. Government leases approximately 23,000 acres from the State of Hawai'i. The lease expires on August 16, 2029. The Army proposes to retain up to 22,750 acres of State-owned land in support of continued military training. The retention will preserve maneuver area, provide austere environment training, enable access between major parcels of U.S. Government-owned land, retain infrastructure investments, allow for future modernization, and maximize use of the impact area. Loss of this land would impact the ability of the Army to meet training requirements and its mission of readiness. The Proposed Action is a real estate action that would enable continuation of ongoing activities. It does not include construction or changes in ongoing activities. Revisions between the [original Draft EIS \(published April 8, 2022\)](#) and this second Draft EIS are generally in Chapters 1-5 and Appendix I. *Please see the [Federal Notices](#) section of this issue for the entry regarding the NEPA aspect of this action; additional information is provided there.*

### Renovation of Old Hilo Memorial Hospital at 34 Rainbow Drive--Final EA (FONSI)

<b>HRS §343-5(a) Trigger</b>	(1) Propose the use of state or county lands or the use of state or county funds
<b>District(s)</b>	South Hilo
<b>TMK(s)</b>	(3) 2-3-026:008
<b>Permit(s)</b>	Numerous (see document)
<b>Proposing/ Determining Agency</b>	County of Hawai'i, Office of Housing and Community Development Neil Erickson, (808) 932-5959, <a href="mailto:NeilC.Erickson@hawaiicounty.gov">NeilC.Erickson@hawaiicounty.gov</a> 1990 Kino'ole Street, Suite 102, Hilo, HI 96720
<b>Consultant</b>	PBR HAWAII; 1001 Bishop Street, ASB Tower, Suite 650, Honolulu, HI 96813 Bradley Furuya, (808) 954-6348, <a href="mailto:bfuruya@pbrhawaii.com">bfuruya@pbrhawaii.com</a>
<b>Status</b>	Finding of No Significant Impact (FONSI) determination

The Project will renovate the existing Old Hilo Memorial Hospital building and convert currently unusable interior space into usable floor area. The Project also proposes to utilize portions of the remaining 24.947-acre property for various types of affordable rental housing units and supportive services, including a potential Department of Health mental health facility. Other areas of the property will be reserved for open space and a walking path connecting Hilo Memorial Hospital to Gilbert Carvalho Park.

**Affidavit of Publication for the  
Second Draft EIS Public Notices**



AFFIDAVIT OF PUBLICATION

IN THE MATTER OF  
PUBLIC NOTICE

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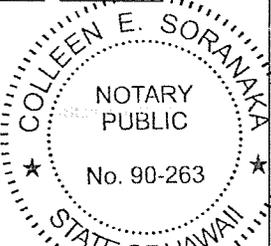
STATE OF HAWAII }  
 } SS.  
City and County of Honolulu }

Doc. Date: MAY 04 2024 and MAY 05 2024 # Pages: 1

Notary Name: COLLEEN E. SORANAKA First Judicial Circuit

Doc. Description: Affidavit of Publication

*Colleen E. Soranaka* MAY 10 2024  
Notary Signature Date



Kimberly Masu being duly sworn, deposes and says that she is a clerk, duly authorized to execute this affidavit of Oahu Publications, Inc. publisher of The Honolulu Star-Advertiser, MidWeek, The Garden Island, West Hawaii Today, and Hawaii Tribune-Herald, that said newspapers are newspapers of general circulation in the State of Hawaii, and that the attached notice is true notice as was published in the

Honolulu Star-Advertiser 3 times on:  
04/19, 04/26, 05/05/2024

MidWeek 0 times on:

The Garden Island 0 times on:

Hawaii Tribune-Herald 3 times on:  
04/19, 04/26, 05/05/2024

West Hawaii Today 3 times on:  
04/19, 04/26, 05/04/2024

Other Publications: 0 times on:

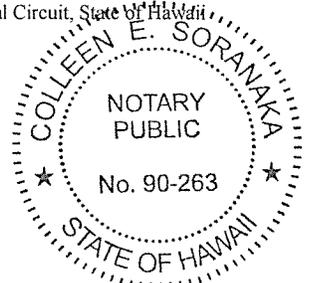
And that affiant is not a party to or in any way interested in the above entitled matter.

*Kimberly Masu*  
Kimberly Masu

Subscribed to and sworn before me this 10<sup>th</sup> day of May A.D. 2024

Colleen E. Soranaka, Notary Public of the First Judicial Circuit, State of Hawaii  
My commission expires: Jan 06 2028

Ad # 0001451971



ICSP.NO.: \_\_\_\_\_

**U.S. Army Publishes Second Draft Environmental Impact Statement for Army Training Land Retention at Pōhākuloa Training Area on Island of Hawai'i**

In accordance with the National Environmental Policy Act (NEPA) and the Hawai'i Environmental Policy Act (HEPA), the Department of the Army (Army) published a Second Draft Environmental Impact Statement (EIS) to analyze the Army's proposed retention of up to approximately 22,750 acres of land currently leased to the Army by the State of Hawai'i ("State-owned land") at Pōhākuloa Training Area (PTA) on the island of Hawai'i. The public comment periods will run concurrently to meet both NEPA and HEPA requirements.

The Army invites public comments on the Second Draft EIS during a public comment period beginning April 19, 2024. The Second Draft EIS and public meeting materials are available on the EIS website: <https://home.army.mil/hawaii/ptaeis/project-home>. The public may also review the Second Draft EIS at the following local libraries: Hawai'i State Library, Hawai'i Documents Center; Hilo Public Library; Kailua-Kona Public Library; and Thelma Parker Memorial Public and School Library. Comments can be submitted on the EIS website, emailed to: [ATLR-PTA-EIS@g70.design](mailto:ATLR-PTA-EIS@g70.design), or mailed to: ATLR PTA EIS Comments, P.O. Box 3444, Honolulu, HI 96801-3444. To be considered in the Final EIS, all comments must be postmarked or email dated by 11:59 p.m. Hawai'i Standard Time on June 7, 2024.

The public is invited to attend Second Draft EIS public meetings on the following dates and times on the Island of Hawai'i:

1. Waimea District Park, May 6, 2024, from 6-8 PM
2. 'Imiloa Astronomy Center, May 7, 2024, from 6-8 PM

Verbal comments will also be accepted over the phone on May 6 and May 7, 2024, by dialing (808) 515-5518.

The public will have the option to watch the Second Draft EIS public meetings through a live video stream that can be accessed on the EIS website. For more information on the Second Draft EIS public meetings, please visit the project website at: <https://home.army.mil/hawaii/ptaeis/project-home>.

For more information or accessibility requests, please contact the U.S. Army Garrison Hawai'i, Public Affairs Office, at [usarmy.hawaii.nepa@army.mil](mailto:usarmy.hawaii.nepa@army.mil) or (808) 787-2140.



# Public Meeting Materials

**Public Scoping  
Open House Materials**

Posters

Fact Sheet

Flyer

Direct Mail Postcard

Questions and Answers

**Draft EIS Public Meeting Materials**

Posters

Fact Sheet

Flyer

Direct Mail Postcard

**Second Draft EIS  
Public Meeting Materials**

Posters

Fact Sheet

Flyer

Direct Mail Postcard



# **Public Scoping Virtual Open House Materials**

**Posters**

**Fact Sheet**

**Flyer**

**Direct Mail Postcard**

**Questions and Answers**



## Posters





# Welcome to the EIS Scoping Virtual Open House

## What is Public Scoping?

Public scoping is conducted early in the process, in compliance with NEPA and HEPA, to provide the public opportunity to inform the Army of known issues and alternatives to be addressed in the EIS.

Public scoping allows the public to:

- Learn about the Proposed Action.
- Offer promising alternatives.
- Explain potential concerns.
- Recommend potential impacts that should be studied.

Scoping materials and other information about the Proposed Action are available on the project website at <https://home.army.mil/hawaii/index.php/PTAEIS>.

Your input is valuable!

## Options to Submit Written Comments

Comment period is September 4 - October 14, 2020

- EIS website: <https://home.army.mil/hawaii/index.php/PTAEIS>
- Email: [usarmy.hawaii.nepa@mail.mil](mailto:usarmy.hawaii.nepa@mail.mil)
- Mail: ATLR PTA EIS Comments  
P.O. Box 3444  
Honolulu, HI 96801-3444

## EIS Scoping Virtual Open House

Wednesday, September 23, 2020 at 4 p.m.

During the Virtual Open House you can:

- View online presentations at <https://home.army.mil/hawaii/index.php/PTAEIS>.
- Call (808) 300-0220 to submit oral comments from 4 – 9 p.m. (only on Wednesday, September 23).

\* **Please Read: Comment submittal through the EIS website is preferred. All comments will be valued equally, regardless of how they are submitted. Please do not submit duplicate comments. Comments should be written clearly, as commenters will not be contacted to provide clarification. Personal contact information will not be published in the Draft or Final EIS. Personal contact information will be maintained for the project record and will not be released unless required by law.**

## What to Expect after Scoping?

After the public scoping period has ended, the Army will consider all public input and incorporate substantive public input into the development of the Draft EIS. The Draft EIS will be made available for public review for at least 45 days. The Army will again consider all public input and incorporate substantive public input into development of the Final EIS. The Army's decision will be documented in a Record of Decision made available to the public no sooner than 30 days following publication of the Final EIS.



# National Environmental Policy Act (NEPA) and Hawai'i Environmental Policy Act (HEPA)

## NEPA

- NEPA is a U.S. law implemented via Title 40 Code of Federal Regulations, Parts 1500–1508.
- NEPA procedures ensure environmental information is available to public officials and citizens before decisions are made, and before actions are taken.
- The Proposed Action is a federally funded action.

## HEPA

- HEPA refers to the State EIS process: Hawai'i Revised Statutes Chapter 34-3, and Hawai'i Administrative Rules Chapter 11-200.1.
- HEPA establishes a system of environmental reviews to guide decision making.
- The Proposed Action includes State-owned land and will comply with HEPA processes.

The EIS will be a joint NEPA-HEPA document. Both public involvement processes will run concurrently.

## NEPA/HEPA

Public involvement is a key component of the NEPA and HEPA processes. Opportunities include:

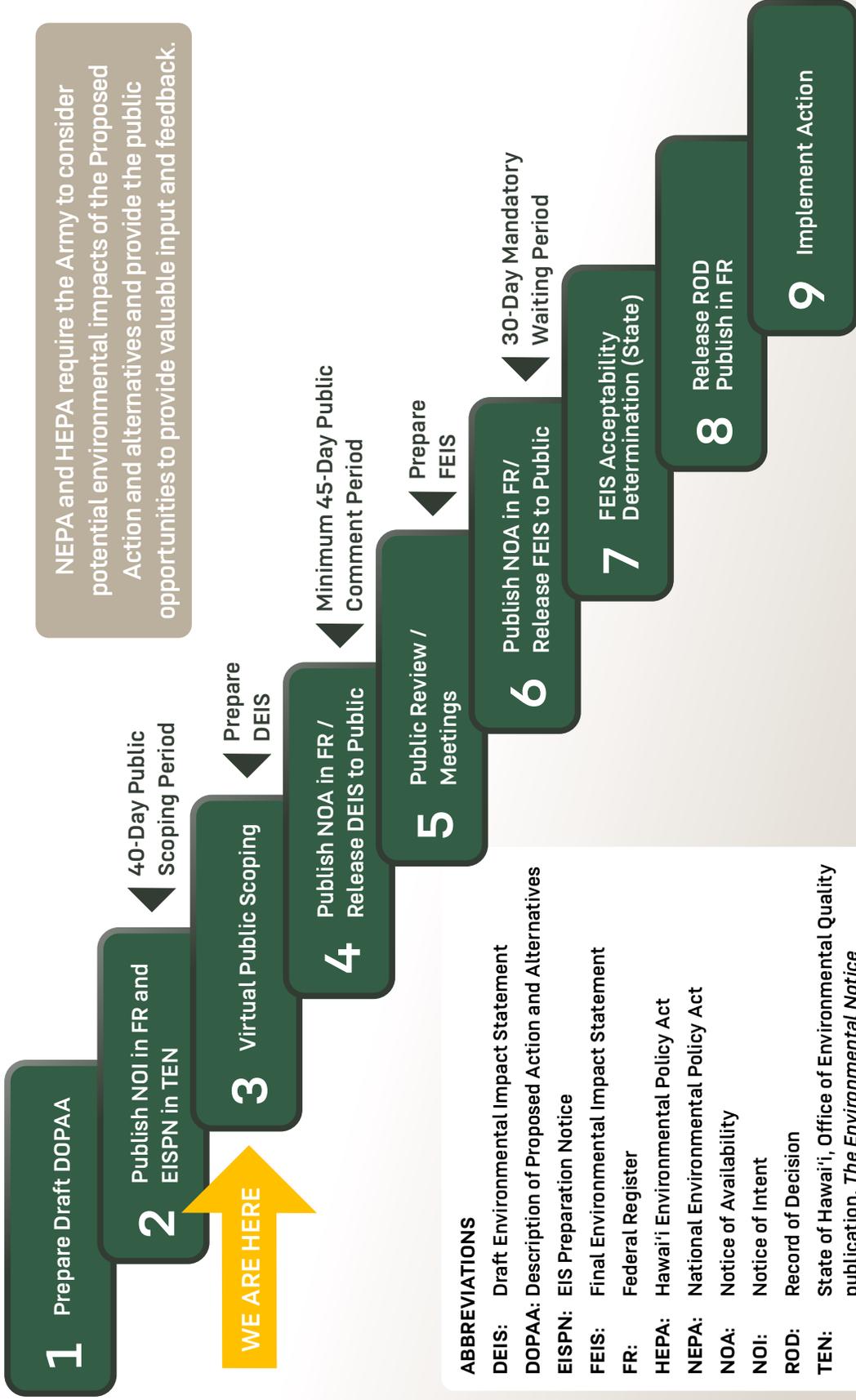
- A 40-day public scoping period for NEPA NOI and HEPA EIS Preparation Notice.
- EIS Scoping Virtual Open House with in-person scoping comment stations and oral comment phone line.
- HEPA Cultural Impact Assessment.
- Draft EIS with a no less than 45-day comment period and public meetings.



Natural resource management at PTA  
Photo Credit: PTA/M. Donnelly

# EIS Process

ARMY TRAINING LAND RETENTION AT PŌHAKULOĀ TRAINING AREA  
ENVIRONMENTAL IMPACT STATEMENT



## ABBREVIATIONS

- DEIS: Draft Environmental Impact Statement
- DOPAA: Description of Proposed Action and Alternatives
- EISPN: EIS Preparation Notice
- FEIS: Final Environmental Impact Statement
- FR: Federal Register
- HEPA: Hawai'i Environmental Policy Act
- NEPA: National Environmental Policy Act
- NOA: Notice of Availability
- NOI: Notice of Intent
- ROD: Record of Decision
- TEN: State of Hawai'i, Office of Environmental Quality publication, *The Environmental Notice*



# Military in Hawai'i and PTA

## Hawai'i is Important to the Military

- Hawai'i is strategically important to national defense. Its location between the continental U.S. and the Indo-Pacific region serves as a logistics link and allows for rapid troop deployment.
- Hawai'i is home to U.S. Indo-Pacific Command, which has responsibility for half of the globe and more than 50% of the world's population.
- Hawai'i hosts the headquarters for U.S. Army Pacific, U.S. Pacific Fleet, U.S. Marine Corps Pacific, Pacific Air Forces, and U.S. Special Operations Command Pacific.
- Hawai'i provides a range of training environments that cannot be replicated in other states, preparing troops to fight as they train.

## The Military is Important to Hawai'i

- As of March 2020, the military employed 71,955 personnel in the State.
- In FY2018, the DOD spent \$7.2 billion in the State.
- In FY2018, the DOD spent \$20.8 million on personnel payroll in the County of Hawai'i.

## PTA is Important to the Military

- PTA is the only area in Hawai'i that supports larger unit (i.e., battalion and brigade) collective live-fire and maneuver training. It is the largest contiguous live-fire range and maneuver training area in Hawai'i, and the primary tactical training area for units conducting military mission essential tasks and training requirements.
- PTA supports joint and multi-national exercises critical to ensure that the U.S. military and allied nations know how to cooperatively work together.
- PTA is the only training area in Hawai'i where military units can use weapons systems at maximum capabilities to complete training requirements.
- PTA is used by the U.S. Army, U.S. Marine Corps, U.S. Navy, U.S. Air Force, U.S. Army Reserve, Hawaii Army National Guard, Hawaii Air National Guard, Hawai'i Police Department and others.



LTC Borce and CSM Ortiz with Youth Challenge Academy Leadership; Civil Air Patrol cadets from Hilo and Kona; Tropic Lightning Soldiers in local parade. Photo Credit: PTA/M.Donnelly



# Why Retain State-owned Land at PTA?

## LEASE IS EXPIRING

The U.S. Government leases approximately 23,000 acres of PTA from the State. The Army has been training there for the past six decades.

## STATE-OWNED LAND ESSENTIAL TO PTA

The State-owned land is the connective tissue of PTA, providing access between major parcels of U.S. Government-owned land in PTA and supporting training facilities, maneuver areas and capabilities that are essential to U.S. Army Hawaii and other military services and local agencies.

## TRAINING AT PTA SAVES LIVES

Properly trained military personnel are prepared for their mission and return home from deployments to their families.

### Examples of Training Facilities on State-owned Land



Military Operation in Urban Terrain Facility. Photo Credit: HDR



Firing Point. Photo Credit: PTA/M. Donnelly



Battle Area Complex (BAX). Photo Credit: PTA/M. Donnelly



# Overview of the Proposed Action

## Proposed Action

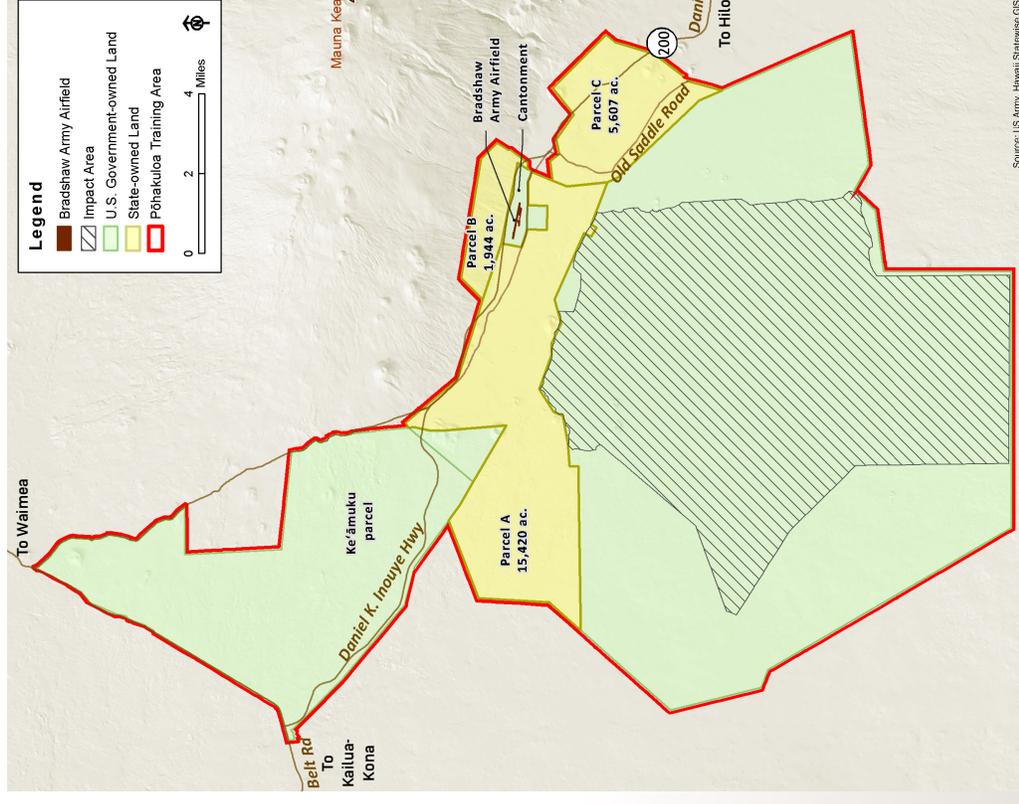
- To retain up to approximately 23,000 acres of State-owned land at PTA in support of continued military training. Multiple land retention methods could be used.
- To retain the State-owned land prior to the end of the current lease and prevent interruption of essential military training.
- After retention of the State-owned land, the Army would continue to conduct the current levels and types of military training; facility and infrastructure maintenance; natural and cultural resources stewardship; and to manage use of the State-owned land by other organizations.
- The Proposed Action does not involve new training, construction, or resource management at PTA. Instead, it is a real estate action that would enable continued military use of the State-owned land.

## Purpose of the Proposed Action

To enable the U. S. Army Hawaii to continue to conduct military training on the State-owned land within PTA to meet its current and future training requirements.

## Need for the Proposed Action

To enable access between major parcels of U.S. Government-owned land in PTA, retain substantial Army infrastructure investments, allow for future facility and infrastructure modernization, preserve limited maneuver area, provide austere environment training, and maximize use of the impact area in support of U.S. Army Hawaii-coordinated training.



Source: US Army, Hawaii, Statewide GIS

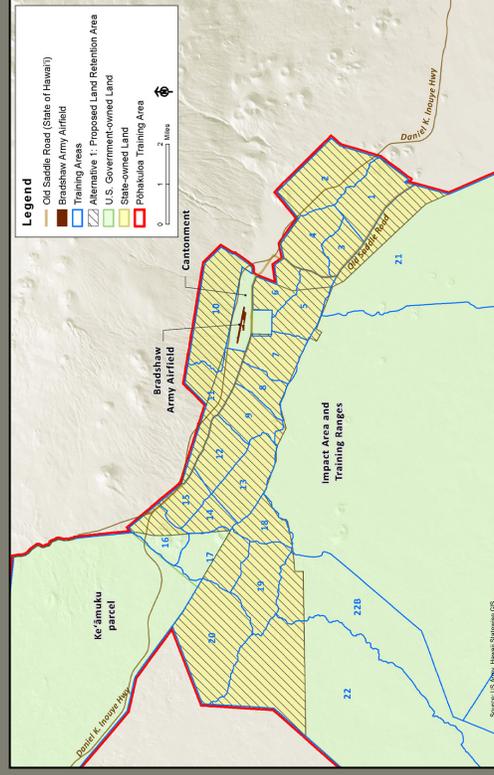
Map Credit: G70

ARMY TRAINING LAND RETENTION AT PŌHAKULOĀ TRAINING AREA  
ENVIRONMENTAL IMPACT STATEMENT



# Alternatives 1 and 2

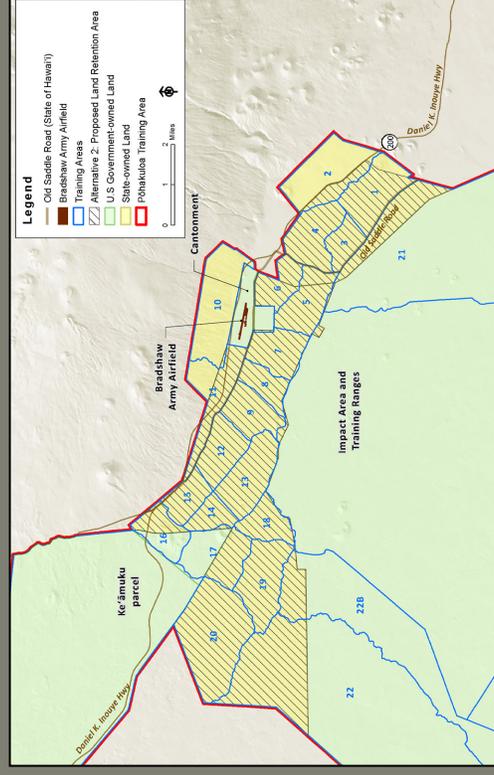
## Alternative 1: Full Retention



Map Credit: G70

Under Alternative 1, all State-owned land would be retained. This alternative allows the Army to retain its substantial investment in facilities, utilities and infrastructure; continue military training without downtime; and conduct future modernization.

## Alternative 2: Modified Retention



Map Credit: G70

Under Alternative 2, the Army would retain approximately 20,000 acres of the State-owned land at PTA. Additionally, the Army would retain all Army-owned utilities, firebreaks/fuel breaks, and fire access roads in the State-owned land not retained.



# Alternative 3 and No Action Alternative

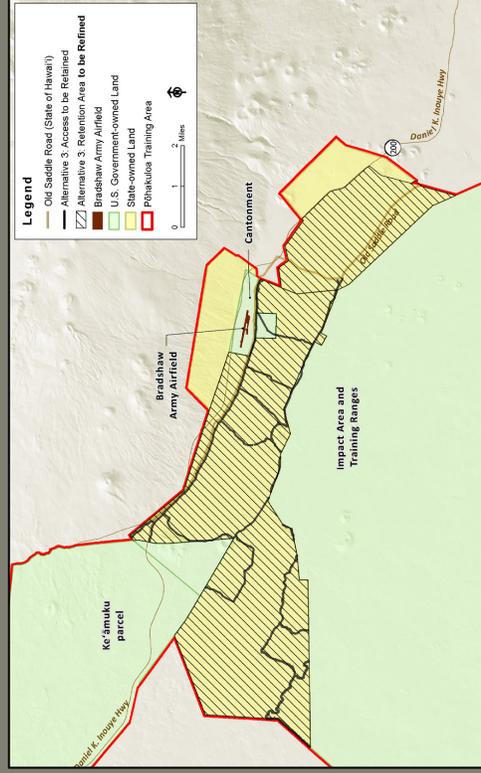
## No Action Alternative



Photo Credit: G70

Under the No Action Alternative, the Army would not retain any of the State-owned land at PTA.

## Alternative 3: Minimum Retention and Access



Map Credit: G70

Under Alternative 3, Army would retain the following: vital training and support facilities and associated maneuver land not able to be relocated within U.S. Government-owned land at PTA; select roads and training trails; all Army-owned utilities; firebreaks/fuel breaks and fire access roads; tactical vehicle wash facility; and land use rights to enable the firing of indirect fire weapons (e.g., artillery, mortars) from U.S. Government-owned portions of PTA northwest of the State-owned land into the impact area. (Specific retention area to be refined in the EIS.)



# Environmental Topics to be Analyzed

## Land Use



Land use compatibility, easements, and real property management

## Geological & Soil Resources



Bedrock, seismology, volcanology, soil properties and erosion

## Biological Resources



Vegetation and wildlife, threatened and endangered species, invasive species, wetlands and wildland fires

## Cultural Resources



Historic buildings and viewsheds, archaeological resources, Native Hawaiian Organizations, traditional and customary practices, hunting, gathering, and cultural beliefs, uses and accesses

## Airspace



Controlled airspace, Special Use Airspace and Military Operations Areas

## Air Quality & Greenhouse Gas



Ambient Air Quality Standards, Prevention of Significant Deterioration, and dust

## Water Resources



Surface water, groundwater, floodplains, and Clean Water Act

## Noise



Zones, community and wildlife impacts

## Human Health & Safety



Health, safety and safety danger zones

## Socioeconomics



Demographics, housing, economic development, recreation, environmental justice and protection of children

## Hazardous Materials



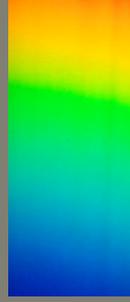
Hazardous materials and wastes, petroleum products, storage tanks, unexploded ordnance, and depleted uranium

## Utilities



Potable water, wastewater, stormwater, solid waste, electricity and communications

## Electromagnetic Spectrum



Radio waves to gamma waves, radio frequency, spectrum use, radar and satellite

## Transportation & Traffic



Roadways, air transportation, traffic volume and level of congestion

ARMY TRAINING LAND RETENTION AT PŌHAKULOĀ TRAINING AREA  
ENVIRONMENTAL IMPACT STATEMENT



# Thank You

# **Fact Sheet**





U.S. ARMY

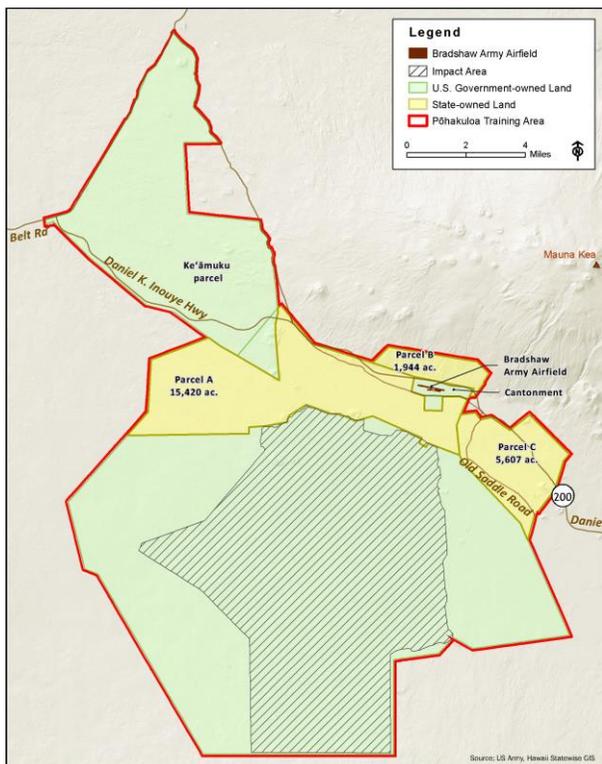
# ARMY TRAINING LAND RETENTION AT PŌHAKULOA TRAINING AREA

## ENVIRONMENTAL IMPACT STATEMENT

The Army is preparing an Environmental Impact Statement (EIS) for Army Training Land Retention at Pōhakuloa Training Area (PTA) on the island of Hawai'i. The Army proposes to retain up to approximately 23,000 acres of State-owned land at PTA. Military training has taken place at PTA since 1956.

The Army is initiating the EIS process under the National Environmental Policy Act (NEPA), guided by the Council on Environmental Quality NEPA implementing regulations in Title 40 Code of Federal Regulations (C.F.R.) Parts 1500–1508, and Army NEPA implementing regulations in Title 32 C.F.R. Part 651. The EIS also will comply with Hawai'i Revised Statutes Chapter 343 and Hawai'i Administrative Rules Chapter 11-200.1, collectively referred to as the Hawai'i Environmental Policy Act (HEPA). Like NEPA, HEPA ensures environmental concerns are given appropriate consideration in decision making, along with economic and technical considerations.

The first step in the NEPA and HEPA processes is to alert the public of the intention to prepare an EIS. This is done through publication of a Notice of Intent (NOI) in the *Federal Register*, and publication of an EIS Preparation Notice (EISPN) in the State Office of Environmental Quality Control's publication, *The Environmental Notice*. The NOI was published on September 4, 2020, and the EISPN was published on September 8, 2020.



*Hawaii Army National Guard Soldiers react to a simulated ambush during annual training at PTA. These Soldiers conduct combat operations training for several weeks during their annual training at PTA.*

## BACKGROUND

PTA consists of approximately 132,000 acres between the volcanic mountains of Mauna Loa, Mauna Kea, and Hualālai on the island of Hawai'i. United States Army Hawaii (USARHAW) conducts training at PTA to meet its federally mandated mission of readiness. Training offered at installations such as PTA supports the Army's fulfillment of its role in the Nation's defense. Users of PTA, including the Army, U.S. Marine Corps, U.S. Navy, U.S. Air Force, U.S. Army Reserve, Hawaii Army National Guard, Hawaii Air National Guard, State and County of Hawai'i first responders and firefighters, Hawai'i Civil Defense Agency, Hawai'i Emergency Management Agency, State Office of Homeland Security, Hawai'i Police Department, and others, rely on the installation to fulfill agency-specific mission and readiness requirements. PTA is the largest contiguous live-fire range and maneuver training area in Hawai'i and is considered the Pacific's Premier Training Center. It is the only U.S. training area in the Pacific region where training units can complete all mission essential tasks, and the only installation in Hawai'i that can accommodate larger than company-sized units (i.e., battalion and brigade) for live-fire and maneuver exercises.

The U.S. Government leases approximately 23,000 acres at PTA from the State. The 65-year lease expires on August 16, 2029. Over the past six decades, the State-owned land has been the keystone of PTA, supporting numerous training facilities and capabilities essential to USARHAW and other military services and local agencies. The State-owned land contains maneuver land and key training facilities, some of which are not available elsewhere in Hawai'i, and provides access between major parcels of U.S. Government-owned land in PTA. Loss of this land would substantially impact the ability of USARHAW and other military services and local agencies to meet their training requirements and mission of readiness.

### FOR MORE INFORMATION OR ACCESSIBILITY REQUESTS

Please contact Michael Donnelly, PTA Public Affairs Officer  
Email: [michael.o.donnelly.civ@mail.mil](mailto:michael.o.donnelly.civ@mail.mil); Phone: (808) 969-2411



U.S. ARMY

# ARMY TRAINING LAND RETENTION AT PŌHAKULOĀ TRAINING AREA

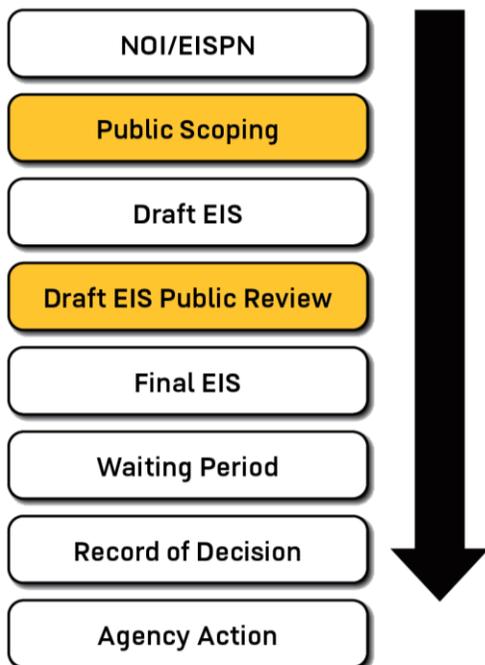
## PROPOSED ACTION AND ALTERNATIVES

The EIS will evaluate the potential direct, indirect, and cumulative impacts of a variety of reasonable alternatives that meet the purpose and need of the Proposed Action, which is to retain up to approximately 23,000 acres of State-owned land at PTA in support of continued military training to meet current and future training requirements. Alternatives to be analyzed in the EIS include: 1) Full Retention; 2) Modified Retention; and 3) Minimum Retention and Access. The No Action Alternative (no retention of State-owned land after 2029) also will be analyzed. Other reasonable alternatives raised during the scoping process and capable of meeting the purpose and need of the Proposed Action will be considered for evaluation in the EIS.

## NEPA/HEPA PUBLIC PARTICIPATION PROCESS

The NEPA/HEPA process graphic (below) shows opportunities for public input in gold. The EIS is currently in the Public Scoping period, which is a time when public comments are received to help shape development of the Draft EIS.

### NEPA/HEPA PROCESS



## PUBLIC SCOPING PROCESS

The intent of the scoping process is to reach out early and engage a broad range of stakeholders with the purpose of informing and eliciting input. The public scoping process will help identify reasonable alternatives, potential impacts, and key issues of concern to be evaluated in the EIS, as well as determine which stakeholders (e.g., individuals, organizations, and government agencies) are interested in commenting on the Draft EIS. Scoping serves as an opportunity to obtain input from the community regarding issues and resources to be addressed or analyzed through the EIS process. In this regard, it helps to define the “scope” of issues and analyses in the EIS.

The public scoping process began September 4, 2020, with publication of the NOI in the *Federal Register*, to be followed by publication of the EISPN. Federal, state, and local agencies, Native Hawaiian organizations, and the public are invited to participate in the scoping process. The 40-day public scoping period ends on October 14, 2020.

### OPTIONS TO SUBMIT WRITTEN COMMENTS

Comment period is September 4 – October 14, 2020

- EIS Website: <https://home.army.mil/hawaii/index.php/PTAEIS>
- Email: [usarmy.hawaii.nepa@mail.mil](mailto:usarmy.hawaii.nepa@mail.mil)
- Mail: ATLR PTA EIS Comments  
P.O. Box 3444  
Honolulu, HI 96801-3444

### EIS SCOPING VIRTUAL OPEN HOUSE

Wednesday, September 23, 2020 at 4 p.m.

During the Scoping Virtual Open House, you can:

- View online presentations and project documents at <https://home.army.mil/hawaii/index.php/PTAEIS>.
- Call (808) 300-0220 to submit oral comments from 4 – 9 p.m. (only on Wednesday, September 23).

**Note:** Comment submittal through the EIS website is preferred. All comments will be valued equally, regardless of how they are submitted. Please do not submit duplicate comments. Comments should be written clearly, as commenters will not be contacted to provide clarification. Personal contact information will not be published in the Draft or Final EIS. Personal contact information will be maintained for the project record and will not be released unless required by law.

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Email: [michael.o.donnelly.civ@mail.mil](mailto:michael.o.donnelly.civ@mail.mil); Phone: (808) 969-2411

**Flyer**





# ARMY TRAINING LAND RETENTION AT PŌHAKULOĀ TRAINING AREA

## ARMY SEEKS PUBLIC COMMENTS ON SCOPE OF ENVIRONMENTAL IMPACT STATEMENT

The Army is preparing an Environmental Impact Statement (EIS) for Army Training Land Retention at Pōhakuloā Training Area (PTA) on the island of Hawai'i. The Army proposes to retain up to approximately 23,000 acres of State-owned land at PTA. Military training has taken place at PTA since it was established in 1956.

The Army is initiating the EIS process under the National Environmental Policy Act (NEPA), guided by the Council on Environmental Quality NEPA implementing regulations in Title 40 Code of Federal Regulations (C.F.R.) Parts 1500–1508, and Army NEPA implementing regulations in Title 32 C.F.R. Part 651. The EIS also will comply with Hawai'i Revised Statutes (HRS) Chapter 343 and Hawai'i Administrative Rules Chapter 11-200.1, collectively referred to as the Hawai'i Environmental Policy Act (HEPA). Like NEPA, HEPA ensures environmental concerns are given appropriate consideration in decision making, along with economic and technical considerations.

## PUBLIC SCOPING PROCESS

The public scoping process will help to identify reasonable alternatives, potential impacts, and key issues of concern to be evaluated in the EIS. In this regard, it helps to define the "scope" of issues and analyses addressed in the EIS. The public scoping period starts on September 4, 2020 and ends on October 14, 2020. Federal, state, and local agencies, Native Hawaiian organizations, and the public are invited to participate in the scoping process. Due to uncertainties regarding COVID-19 restrictions, in-person public scoping meetings will not be held. The Army is providing opportunities for public input during the scoping process by facilitating an EIS Scoping Virtual Open House.

## REVIEW PROJECT INFORMATION

- ▶ <https://home.army.mil/hawaii/index.php/PTAEIS>

## OPTIONS TO SUBMIT WRITTEN COMMENTS

Comment period is September 4, 2020 - October 14, 2020.

- ▶ EIS website: <https://home.army.mil/hawaii/index.php/PTAEIS>
- ▶ Email: [usarmy.hawaii.nepa@mail.mil](mailto:usarmy.hawaii.nepa@mail.mil)
- ▶ Mail: ATLR PTA EIS Comments  
P.O. Box 3444  
Honolulu, HI 96801-3444

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Phone: (808) 969-2411

## EIS SCOPING VIRTUAL OPEN HOUSE

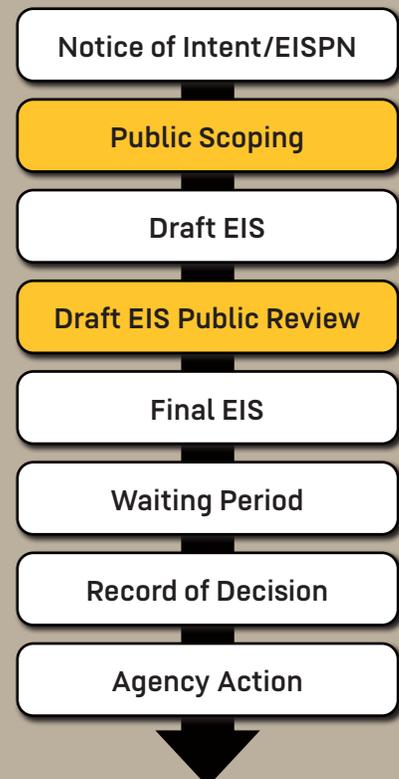
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## NEPA/HEPA PUBLIC PARTICIPATION PROCESS

The NEPA/HEPA process graphic (below) shows opportunities for public input in gold.





# **Direct Mail Postcard**





## ARMY TRAINING LAND RETENTION AT PŌHAKULOA TRAINING AREA

### Army seeks public comments on scope of Environmental Impact Statement (EIS)

The Army proposes to retain up to approximately 23,000 acres of State-owned land at Pōhakuoloa Training Area on the island of Hawai'i in support of continued military training. The Army is initiating the EIS process under the National Environmental Policy Act (NEPA) and the Hawai'i Environmental Policy Act (HEPA). The NEPA and HEPA processes ensure environmental and economic issues are given appropriate consideration in decision making. The Army is seeking public comments during the EIS scoping period from September 4 – October 14, 2020, to identify reasonable alternatives, potential impacts, and key issues of concern to be evaluated in the EIS. Scoping materials and other information about the Proposed Action are available on the project website at: <https://home.army.mil/hawaii/index.php/PTAEIS>.

#### OPTIONS TO SUBMIT WRITTEN COMMENTS

Comment period is September 4 - October 14, 2020.

- EIS Website: <https://home.army.mil/hawaii/index.php/PTAEIS>
- Email: [usarmy.hawaii.nepa@mail.mil](mailto:usarmy.hawaii.nepa@mail.mil)
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Phone: (808) 969-2411

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NEPA Program Manager  
U.S. Army Garrison Hawaii  
Directorate of Public Works - Environmental  
948 Santos Dumont Ave.  
Building 105, 3rd Floor  
Wheeler Army Airfield  
Schofield Barracks, HI 96857-5013

# Questions and Answers



## **QUESTIONS AND ANSWERS (Q's & A's)**

### **Environmental Impact Statement for Army Training Land Retention at Pōhakuloa Training Area in Hawai'i**

**September 3, 2020**

#### **Q-1. What is the Pōhakuloa Training Area (PTA) and what is it used for?**

**A-1:** PTA is on the island of Hawai'i and encompasses approximately 132,000 acres of land for the specific purpose of preparing military personnel for the rigors of combat. U.S. Army Hawaii (USARHAW) conducts training at PTA to meet its federally mandated mission of readiness. Training offered at installations such as PTA support the Army's fulfillment of its role in the Nation's defense. Users of PTA, including the Army, U.S. Marine Corps, U.S. Navy, U.S. Air Force, U.S. Army Reserve, Hawaii Army National Guard, Hawaii Air National Guard, State and County of Hawai'i first responders and firefighters, Hawai'i Civil Defense Agency, Hawai'i Emergency Management Agency, State Office of Homeland Security, Hawai'i Police Department, and others, rely on the installation to fulfill agency-specific mission and readiness requirements. PTA is the largest contiguous live-fire range and maneuver training area in Hawai'i and is considered the Pacific's Premier Training Center. It is the only U.S. training area in the Pacific region where training units can complete all mission essential tasks, and the only U.S. training facility in the Pacific region that can accommodate larger than company-sized units for live-fire and maneuver exercises.

#### **Q-2. What is the background of Army training use at PTA and future needs?**

**A-2:** The Pōhakuloa area was used for training as early as 1938, but not routinely used until 1943. PTA was formally established in 1956 through a maneuver agreement granted by the Territory of Hawai'i. Approximately 23,000 acres of land were leased for military purposes to the Army in 1964 by the state (State-owned land). The 65-year lease expires on August 16, 2029. The State-owned land contains maneuver land and key training facilities, some of which are not available elsewhere in Hawai'i, and provides access between major parcels of U.S. Government-owned land on PTA. This land has been key to PTA's ability to support numerous training facilities and capabilities essential to USARHAW and other military services and local agencies. The Army proposes to retain up to approximately 23,000 acres of State-owned land at PTA in support of continued military training (the "Proposed Action").

#### **Q-3. Why is the Environmental Impact Statement (EIS) being prepared?**

**A-3:** The National Environmental Policy Act of 1969 (NEPA) requires federal agencies to examine the potential effects of proposed actions on the human environment. Under Hawai'i Revised Statutes (HRS) Chapter 343 and Hawai'i Administrative Rules (HAR) Chapter 11-200.1, collectively referred to as the Hawai'i Environmental Policy Act

(HEPA), use of State lands is a trigger that requires environmental disclosure. An EIS-level analysis is being conducted as, in accordance with HAR Section 11-200.1-14(d)(2), the accepting authority, the Hawai'i Department of Land and Natural Resources, has determined, through its judgement and experience, that the applicant's Proposed Action may have a significant effect.

NEPA regulations for environmental disclosure (environmental assessments or environmental impact statements) are guided by the Council on Environmental Quality (CEQ) in Title 40 Code of Federal Regulations [C.F.R.] Parts 1500-1508. Specific Army NEPA implementation regulations are in Title 32 C.F.R. Part 651.

The Army intends to prepare a single EIS, compliant with both NEPA and HEPA regulations, to facilitate concurrent public review and processing at both the federal and state levels of government.

**Q-4. What is the difference between NEPA and HEPA?**

**A-4:** NEPA and HEPA require government agencies proposing to use government land to identify and analyze the potential adverse environmental, social and economic effects of the Proposed Action and reasonable alternatives to the Proposed Action that would provide similar benefits with different environmental impacts. NEPA and HEPA procedures ensure environmental information is available to public officials and citizens before decisions are made and before actions are taken, and both allow for public disclosure and participation.

Like NEPA, the purpose of HEPA is to ensure environmental concerns are given appropriate consideration in decision making, along with economic and technical considerations, and allow for public disclosure and participation. Both require publication of a notice to alert the public to preparation of an EIS, with a public scoping period prior to preparation of an EIS.

**Q-5. What agency is undertaking the EIS?**

**A-5:** The project proponent undertaking the EIS is U.S. Army Garrison-Hawaii (USAG-HI). The preparer of the EIS is the Department of the Army.

**Q-6. What Proposed Action is being considered in the EIS?**

**A-6:** The Proposed Action is to retain up to approximately 23,000 acres of State-owned land at PTA in support of continued military training. The Army would retain the State-owned land prior to the end of the current lease to limit impacts on training.

**Q-7. What is the purpose and need for the Proposed Action?**

**A-7:** The purpose of the Proposed Action is to enable USARHAW to continue to conduct military training on the State-owned land within PTA to meet its current and future training requirements. The Proposed Action is needed to allow access between major parcels of U.S. Government-owned land at PTA, retain substantial Army infrastructure investments, allow for future facility and infrastructure modernization, preserve limited maneuver area, provide austere environment training, and maximize use of the impact area in support of USARHAW-coordinated training.

**Q-8. What resources will be analyzed in the EIS?**

**A-8:** The EIS will analyze the following resources: air quality and greenhouse gases, airspace, biological resources, archaeological and cultural resources, electromagnetic spectrum, geology and soils, hazardous and toxic materials and wastes, human health and safety, land use, noise, socioeconomics and environmental justice, transportation and traffic, utilities, and water resources. The EIS will quantitatively and qualitatively analyze and evaluate the potential environmental and socioeconomic impacts of the proposed alternatives.

**Q-9. What resources may be significantly impacted from implementation of the Proposed Action?**

**A-9:** An EIS-level analysis is being undertaken as the land retention action could have significant impacts (adverse or beneficial) on biological resources, cultural resources, hazardous and toxic materials and wastes, socioeconomics, utilities, and human health and safety.

**Q-10. Q-10. What methods of land retention is the Army considering?**

**A-10:** Army Regulation 405-10 identifies authorized methods for Army retention of non-federal land which include title, lease, easement, and license. Several retention methods can be accomplished through different mechanisms according to Army Regulations. The Army would negotiate with the State regarding the most appropriate land retention method(s) for the selected alternative after issuance of the Record of Decision.

**Q-11. When is the scoping period for the EIS?**

**A-11:** The scoping period for a NEPA EIS will occur for 40 days after the publication of the Notice of Intent (NOI) in the *Federal Register*. In accordance with HAR Section 11-200.1-23(c), the HEPA scoping period is within 30 days after the publication of the EIS Preparation Notice (EISPN) in *The Environmental Notice*, the state Office of Environmental Quality Control's publication.

As the EIS will be a joint NEPA-HEPA document, the public scoping processes will run concurrently and will jointly meet NEPA and HEPA requirements. The NOI will be published in the *Federal Register* on September 4, 2020 and the EISPN will be

published in *The Environmental Notice* on September 8, 2020. The joint NEPA-HEPA scoping period will end on October 14, 2020.

The Army has voluntarily chosen to extend the NEPA scoping period. The collective NEPA scoping period will be 40 days.

**Q-12. How can the public be involved in the EIS scoping process?**

**A-12:** The public scoping process will help identify possible alternatives, potential environmental impacts, and key issues of concern to be analyzed in the EIS, as well as eliminate issues from detailed consideration that are not significant, or which have been covered by prior environmental reviews.

The Army invites public comments on the scope of the EIS during a 40-day public scoping period beginning September 4, 2020. Comments can be submitted on the EIS website: <https://home.army.mil/hawaii/index.php/PTAEIS>, as well as emailed to [usarmy.hawaii.nepa@mail.mil](mailto:usarmy.hawaii.nepa@mail.mil), or mailed to: ATLR PTA EIS Comments, P.O. 25 Box 3444, Honolulu, HI 96801-3444. All comments must be postmarked or submitted by October 14, 2020, to be considered in preparation of the EIS.

Due to public health concerns from COVID-19, large group, in-person public scoping meetings will not be held. The public is invited to participate in an online EIS scoping virtual open house September 23, 2020, which will take place on the project website: <https://home.army.mil/hawaii/index.php/PTAEIS>. During the virtual open house participants can:

- 1) View online presentations.
- 2) Call (808) 300-0220 to submit oral comments from 4 p.m. – 9 p.m. (Wednesday, September 23 only).

Written comments (mail, email, EIS website) will be accepted throughout the scoping period. Oral comments will be summarized in the Draft EIS, and the recording will be made available to the Office of Environmental Quality Control for the public record. Written comments and associated responses will be included in the Draft EIS.

**Q-13. How do you submit comments and, if you have further questions, whom should you contact?**

**A-13:** Written comments and/or concerns regarding the scope of the EIS can be submitted via the EIS website at: <https://home.army.mil/hawaii/index.php/PTAEIS>. Alternatively, comments can be emailed to: [usarmy.hawaii.nepa@mail.mil](mailto:usarmy.hawaii.nepa@mail.mil), or mailed to: ATLR PTA EIS Comments, P.O. Box 3444, Honolulu, HI 96801-3444.

Comments will be accepted from September 4 through October 14, 2020. All comments will be valued equally, regardless of how they are submitted. Comment submittal through the EIS website is preferred. Please do not submit duplicate comments. Personal contact

information will not be published in the Draft or Final EIS. Personal contact information will be maintained for the project record and will not be released unless required by law. All relevant identifying information of public agencies, organizations, and elected officials will be published in the EIS. Comments should be written clearly, as commenters will not be contacted to provide clarification. For those who do not have ready access to a computer or internet, the scoping materials posted to the EIS website will be made available upon request by mail.

For more information or accessibility requests, please contact Michael Donnelly, PTA Public Affairs Officer by email: michael.o.donnelly.civ@mail.mil, or phone: (808) 969-2411.

**Q-14. Will the public have additional opportunities to participate in the EIS process?**

**A-14:** Yes, there will be additional opportunities to participate in the EIS process. The public will be able to participate in a minimum 45-day review period following publication of a future Notice of Availability (NOA) for the Draft EIS. Public outreach will be conducted during the 45-day comment period. Written comments will be accepted on the Draft EIS for 45 days after publication of the NOA in the *Federal Register*.

The Final EIS will also be made available through an NOA, to be published in the *Federal Register*, initiating the 30-day waiting period. The Army will complete the EIS process by issuing a Record of Decision no sooner than 30 days following the U.S. Environmental Protection Agency's NOA in the *Federal Register*, to provide notice that a Final EIS has been filed.

Written comments also will be accepted for the HRS Chapter 343 process for 45 days after publication of the NOA of the Draft EIS in *The Environmental Notice*. A similar NOA will be published in *The Environmental Notice* for the Final EIS. The Hawai'i Department of State Board of Land and Natural Resources will conduct an acceptability determination of the Final EIS.

**Q-15. When will the Draft EIS be completed?**

**A-15:** A definitive timeline has not been established for the completion of the Draft EIS; however, it is estimated that the Draft EIS will be available by February 2022.



# **Draft EIS Public Meeting Materials**

**Posters**

**Fact Sheet**

**Flyer**

**Direct Mail Postcard**



## Posters





# Welcome to the Draft EIS Public Meeting

## What are Draft EIS Public Meetings?

Draft EIS public meetings are conducted in compliance with NEPA and HEPA to provide the public an opportunity to comment on the Draft EIS to aid Army development of the Final EIS.

Public meetings allow the public to:

- Learn about the Proposed Action and alternatives that were analyzed.
- Learn about potential impacts.
- Inform the Army of potential concerns.
- Recommend potential impacts that should be studied further, and aid in establishing a preferred alternative.

The Draft EIS and additional materials are available on the EIS website at <https://home.army.mil/hawaii/index.php/PTAEIS> as well as at four State libraries: Hawaii'i State Library, Hawaii'i Documents Center; Hilo Public Library; Kailua-Kona Public Library; Thelma Parker Memorial Public and School Library.

## What to Expect after Public Comment Period?

After the public comment period has ended, the Army will consider all public input and incorporate substantive public input into the development of the Final EIS, including a decision on the preferred alternative. The Army's decision will be documented in a Record of Decision made available to the public no sooner than 30 days following publication of the Final EIS.

Your input is valuable!

## Options to Submit Comments

Comment period is April 8 – June 7, 2022

- In-person: attend a public meeting
- EIS website: <https://home.army.mil/hawaii/index.php/PTAEIS>
- Email: [atlr-pta-eis@g70.design](mailto:atlr-pta-eis@g70.design)
- Phone: (808) 470-8884 (April 25-26 only)
- Mail: ATLR PTA EIS Comments  
P.O. Box 3444  
Honolulu, HI 96801-3444



Scan with smartphone to be directed to the PTA EIS website.

## Draft EIS Public Meetings

Federal, state, and local agencies and officials; Native Hawaiian organizations; and the public are invited to participate in the Draft EIS public meetings and provide comments, which will be held at the following locations on the following dates and times:

1. 'Imiloa Astronomy Center on April 25, 2022 from 6-8 PM HST
2. Waimea District Park on April 26, 2022 from 6-8 PM HST

The public will have the option to watch the Draft EIS Public Meetings in real time via a live stream that can be accessed on the EIS website at: <https://home.army.mil/hawaii/index.php/PTAEIS>.

*Note: All comments will be valued equally, regardless of how they are submitted. Personal contact information will not be published in the Final EIS. Personal contact information will be maintained for the project record and will not be released unless required by law.*

Scan to hear this poster explained.





# National Environmental Policy Act (NEPA) and Hawai'i Environmental Policy Act (HEPA)

## NEPA

- NEPA is a U.S. law implemented via Title 40 Code of Federal Regulations, Parts 1500–1508.
- NEPA procedures ensure environmental information is available to public officials and citizens before decisions are made and before actions are taken.
- The Proposed Action is a federally funded real estate action.

## HEPA

- HEPA refers to the State EIS process: Hawai'i Revised Statutes Chapter 34-3, and Hawai'i Administrative Rules Chapter 11-200.1.
- HEPA establishes a system of environmental reviews to guide decision making.
- The Proposed Action includes State-owned land and will comply with HEPA processes.



Natural resource management at PTA  
Photo Credit: PTA

The Draft EIS is a joint NEPA-HEPA document. Both public involvement processes will run concurrently.

## NEPA/HEPA

Public involvement is a key component of the NEPA and HEPA processes. Opportunities include:

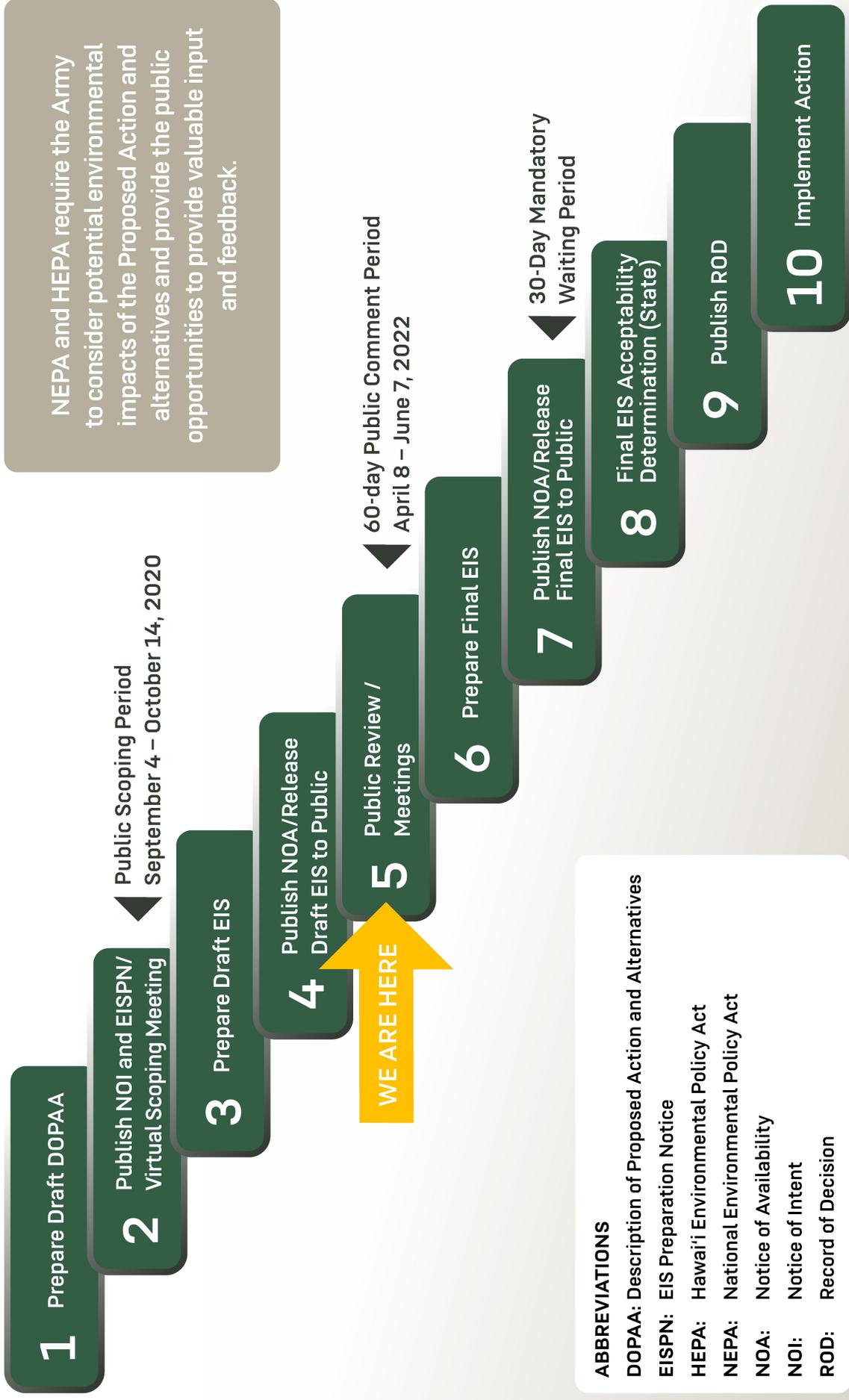
- A 40-day public scoping period that ran from September 4 to October 14, 2020.
- EIS Scoping Virtual Open House with oral comment phone line (September 23, 2020).
- HEPA Cultural Impact Assessment (completed October 2021).
- Draft EIS (NOA on April 8, 2022) with a 60-day comment period (from April 8 – June 7, 2022) and two public meetings.



Scan to hear this poster explained.



# EIS Process





# Military in Hawai'i and PTA

## Hawai'i is Important to the Military

- Hawai'i is strategically important to national defense. Its location between the continental U.S. and the Indo-Pacific region serves as a logistics link and allows for rapid troop deployment.
- Hawai'i is home to U.S. Indo-Pacific Command, which has an area of responsibility that covers half the globe and more than 50% of the world's population.
- Hawai'i hosts the headquarters for U.S. Army Pacific, U.S. Pacific Fleet, U.S. Marine Corps Forces Pacific, Pacific Air Forces, and U.S. Special Operations Command Pacific.
- Hawai'i provides a range of training environments that cannot be replicated in other states, preparing troops to fight as they train.



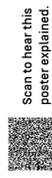
LTC Kevin Cronin, PTA Garrison Commander, and CSM Harold Gray with Noelani Kalipi, Civilian Aide to the Secretary of the Army (Hawai'i Island); Civil Air Patrol cadets from Hilo and Kona; Tropic Lightning Soldiers in local parade. Photo Credit: PTA

## Military Economic Benefits to Hawai'i

- In 2021, there were 71,323 total defense personnel in the State.
- In FY 2019, the U.S. military paid \$5.0 billion in wages to defense personnel in the State.
- In FY 2019, overall defense spending in Hawai'i was \$7.5 billion.

## PTA is Important to the Military

- PTA is the only area in Hawai'i that supports larger unit (i.e., battalion and brigade) collective live-fire and maneuver training. It is the largest contiguous live-fire range and maneuver training area in Hawai'i, and the primary tactical training area in Hawai'i for units conducting mission essential tasks and training requirements.
- PTA supports joint and multi-national exercises critical to ensure that the U.S. military and allied nations know how to cooperatively work together.
- PTA is the only training area in Hawai'i where military units can use weapons systems at maximum capabilities to complete training requirements.
- PTA is used by the U.S. Army, U.S. Marine Corps, U.S. Navy, U.S. Air Force, U.S. Army Reserve, Hawaii Army National Guard, Hawaii Air National Guard, Hawai'i Police Department and others.



Scan to hear this poster explained.



# Why Retain State-owned Land at PTA?

## LEASE IS EXPIRING

The U.S. Government leases approximately 23,000 acres of PTA from the State. The Army has been training at PTA for the past six decades. The lease expires in 2029.

## STATE-OWNED LAND ESSENTIAL TO PTA

The State-owned land is the connective tissue of PTA, providing access between major parcels of U.S. Government-owned land in PTA and supporting training facilities, maneuver areas and capabilities that are essential to U.S. Army Hawaii and other military services and local agencies.

## TRAINING AT PTA SAVES LIVES

Properly trained military personnel are prepared for their mission and return home from deployments to their families.

### Examples of Training Facilities on State-owned Land



Military Operations in Urban Terrain Facility. Photo Credit: HDR



Firing Point. Photo Credit: PTA



Battle Area Complex (BAX). Photo Credit: PTA



Scan to hear this poster explained.



# Overview of the Proposed Action

## Proposed Action

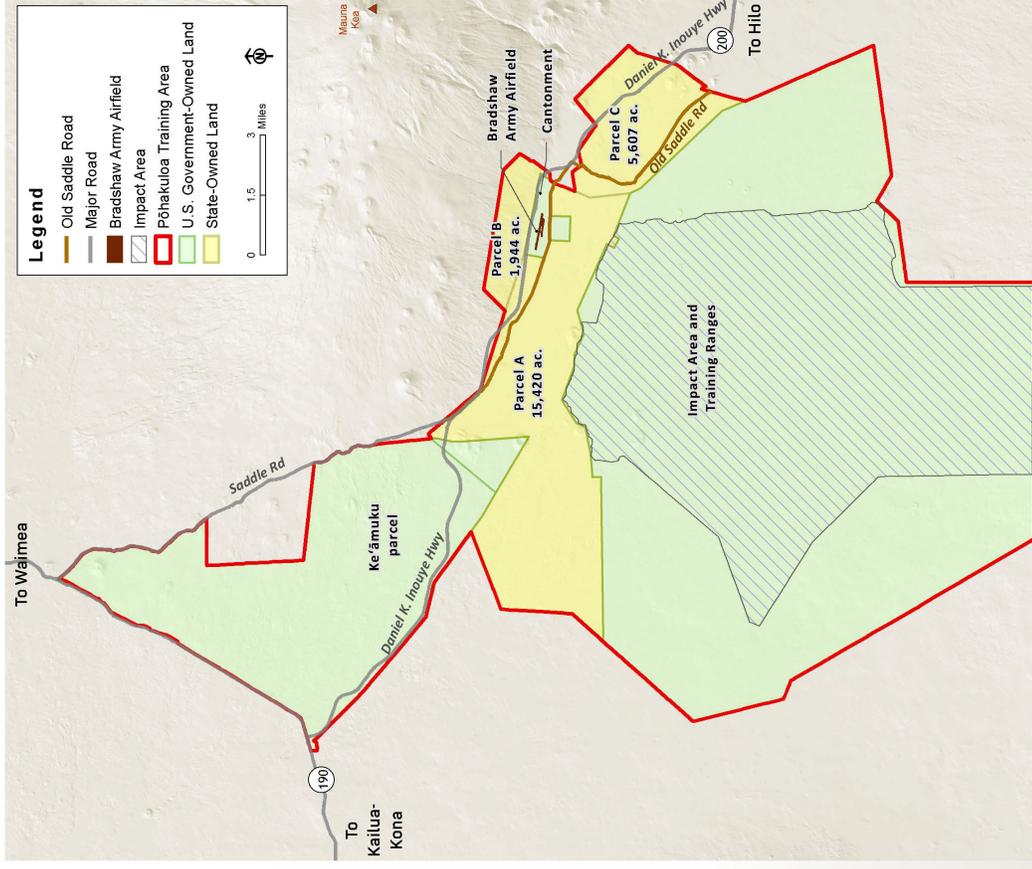
- To retain up to approximately 23,000 acres of State-owned land at PTA in support of continued military training. Multiple land retention estates and methods could be used.
- To retain the State-owned land prior to the end of the lease to prevent interruption of essential military training.
- After arrangement for retention of the State-owned land, the Army would continue its ongoing activities (training; facility, utility, and infrastructure maintenance and repair activities; resource management actions; and associated activities), and it would continue to coordinate ongoing activities by other PTA users.
- The Proposed Action does not include construction, modernization, or changes in ongoing activities. Instead, it is a real estate action that would enable continued military use of the State-owned land.

## Purpose of the Proposed Action

To enable U.S. Army Hawaii to continue to conduct military training on State-owned land within PTA to meet its ongoing training requirements.

## Need for the Proposed Action

To enable access between major parcels of U.S. Government-owned land in PTA, retain substantial Army infrastructure investments, allow for future facility and infrastructure modernization, preserve limited maneuver area, provide austere environment training, and maximize use of the impact area in support of U.S. Army Hawaii-coordinated training.



Sources: US Army, USACE-POH, Hawaii Statewide GIS

Map Credit: G70

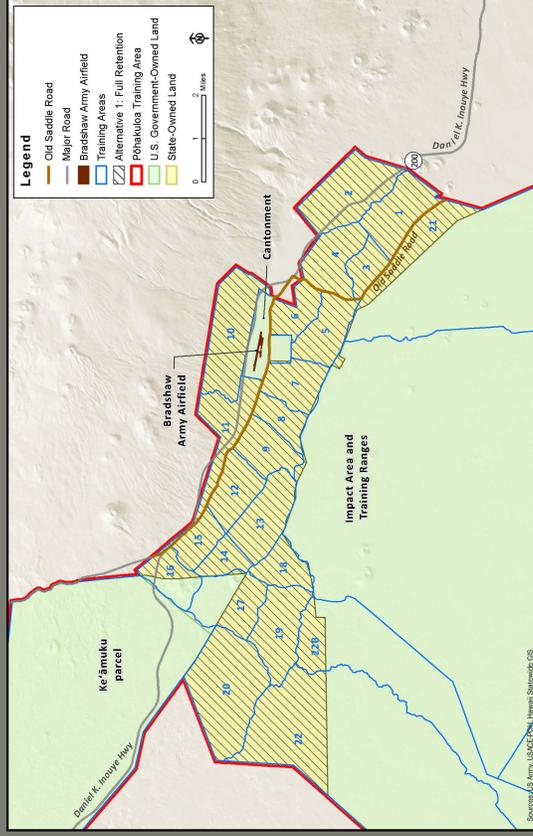


Scan to hear this poster explained.



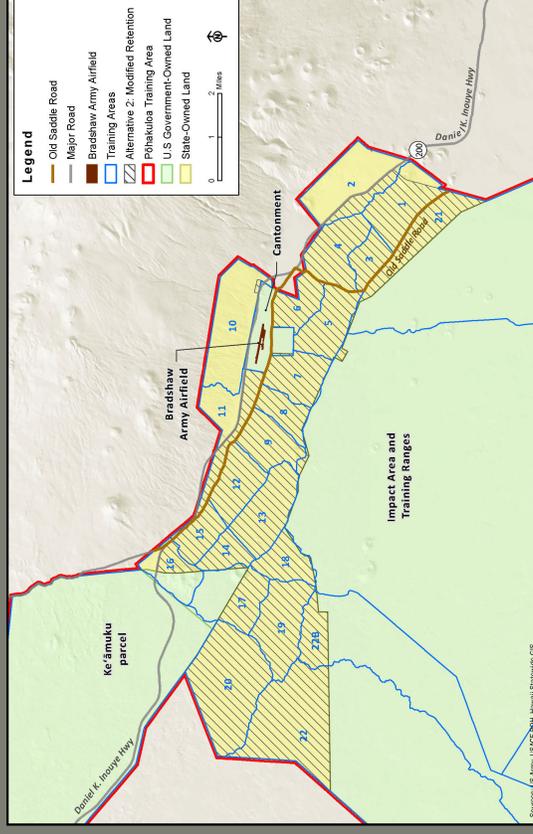
# Alternatives 1 and 2

## Alternative 1: Full Retention



Under Alternative 1, all 23,000 acres of State-owned land would be retained. This alternative allows the Army to retain its substantial investment in facilities, utilities and infrastructure; continue military training and other ongoing activities without downtime; and conduct future modernization.

## Alternative 2: Modified Retention



Under Alternative 2, the Army would retain approximately 19,700 acres of the State-owned land at PTA. Additionally, the Army would retain all U.S. Government-owned utilities and associated access in the State-owned land.

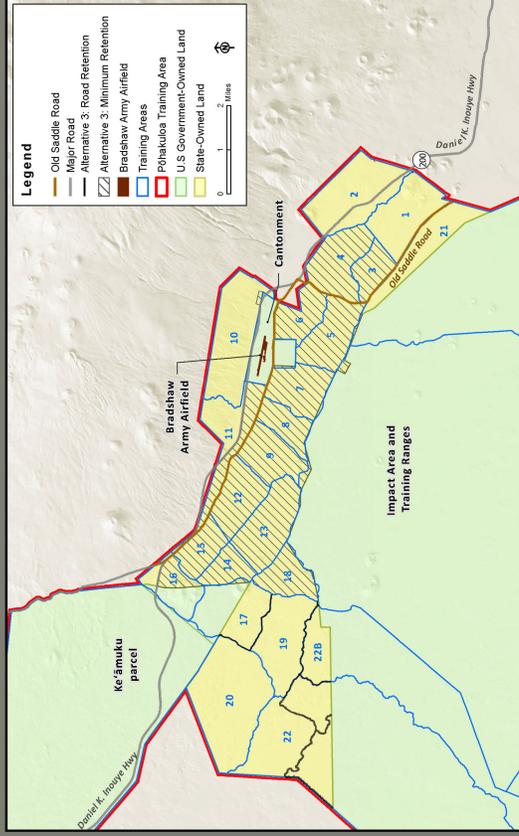


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# Alternative 3 and No Action Alternative

## Alternative 3: Minimum Retention and Access



Map Credit: G70

Under Alternative 3, the Army would retain approximately 10,100 acres and 11 miles of select roads and training trails. Additionally, the Army would retain all U.S. Government-owned utilities and associated access, firebreak/fuel breaks and associated access along most of the select roads and training trails proposed for retention, and land use rights to enable firing of indirect-fire weapons from U.S. Government-owned land at PTA northwest of the State-owned land into the impact area.

## No Action Alternative

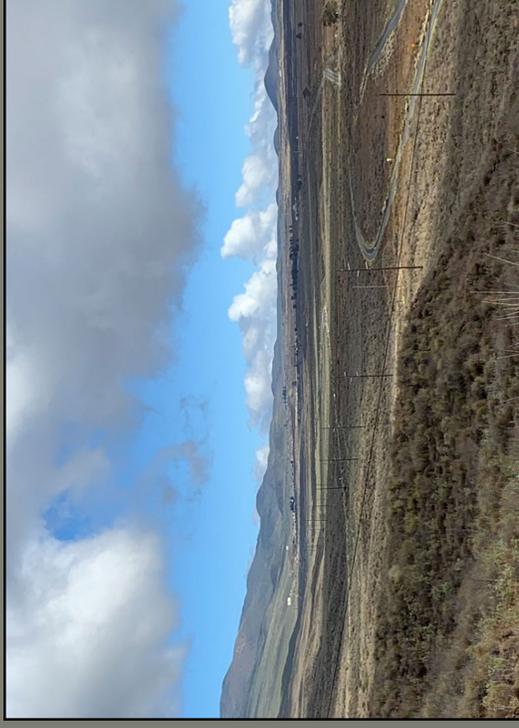


Photo Credit: G70

Under the No Action Alternative, the Army would not retain any of the State-owned land at PTA after lease expiration.



Scan to hear this poster explained.



# Draft EIS Summary of Impacts

## Level of Impacts Key

Level of significance conveys the intensity of potential impacts and are classified as follows:

- No impact:** Impacts are not present.
- Less than significant:** Impacts that are negligible to moderate but would not reach the resource's threshold of significance.
- Significant:** Impacts to a resource would surpass a significance threshold; impacts would be obvious and easily noticed by an observer.
- Significant but mitigable:** Impacts would be significant but could be mitigated to less than significant.
- Beneficial impacts:** Beneficial impacts would improve the condition of a resource, whereas adverse impacts would cause a decline in the condition of a resource.

## Land Use



Continued adverse impacts to recreation from restricted public access. New beneficial impacts on land tenure and conformance with State land use policy. Impacts would be less than significant.

## Biological Resources



Continued adverse impacts from ongoing activities. Impacts would be less than significant.

## Cultural Resources



No impacts to architectural resources. Less than significant continued adverse impacts to archaeological sites due to ongoing activities. Significant but mitigable continued adverse impacts to traditional and customary practices from access limitations.

## Hazardous and Toxic Materials and Wastes



Continued adverse impacts from ongoing activities. Impacts would be less than significant and would be minimized through management measures.

## Air Quality and Greenhouse Gases



Continued adverse impacts on air quality and greenhouse gases from ongoing activities. Impacts would be less than significant.

## Noise



Continued adverse noise impacts from ongoing activities. Impacts would be less than significant.

## Geological & Soil Resources



Continued adverse impacts related to soil disturbances from ongoing activities. Impacts would be less than significant and would be minimized through established programs.

Note: Impacts shown are for Alternative 1. Beneficial impacts are anticipated for most resource areas due to decreased military activities on State-owned land under Alternatives 2 and 3, with the exception that increased adverse impacts are anticipated for Socioeconomics and Human Health and Safety.

Photo Credits: PTA. Map Credits: G70





# Draft EIS Summary of Impacts

## Water Resources



Continued adverse impacts on water resources from ongoing activities. Impacts would be less than significant.

## Socioeconomics



Continued beneficial impacts from ongoing activities. Impacts would be less than significant.

## Environmental Justice



For low-income and minority populations and native Hawaiians, there would be disproportionate adverse impacts related to land use, cultural resources, and transportation and traffic. These impacts would be minor or mitigated to less than significant and are not anticipated to harm human health or the environment. Impacts would be less than significant.

## Transportation & Traffic



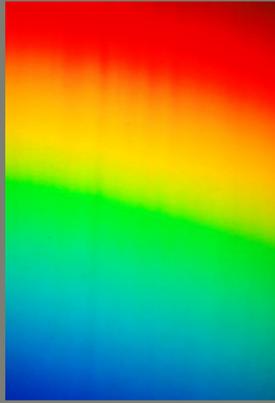
Continued adverse impacts from ongoing activities. Impacts would be less than significant.

## Airspace



Continued adverse impacts on civilian air traffic due to the need to avoid military training in restricted airspace. Impacts would be less than significant.

## Electromagnetic Spectrum



Continued adverse impacts on safety from continued use of electromagnetic spectrum equipment. Impacts would be less than significant.

## Utilities



Continued adverse impacts on public and U.S. Government-owned utilities from ongoing activities. Impacts would be less than significant.

## Human Health & Safety



Continued adverse impacts from ongoing activities and continued beneficial impacts from PTA providing emergency services beyond the installation and permitting non-DoD emergency services agencies to train within the State-owned land. Impacts would be less than significant.

**Note:** Impacts shown are for Alternative 1. Beneficial impacts are anticipated for most resource areas due to decreased military activities on State-owned land under Alternatives 2 and 3, with the exception that increased adverse impacts are anticipated for Socioeconomics and Human Health and Safety.



Scan to hear this poster explained.

ARMY TRAINING LAND RETENTION AT PÓHAKULOÁ TRAINING AREA  
DRAFT ENVIRONMENTAL IMPACT STATEMENT (EIS)



# Thank You



Scan to hear this  
poster explained.



# Fact Sheet





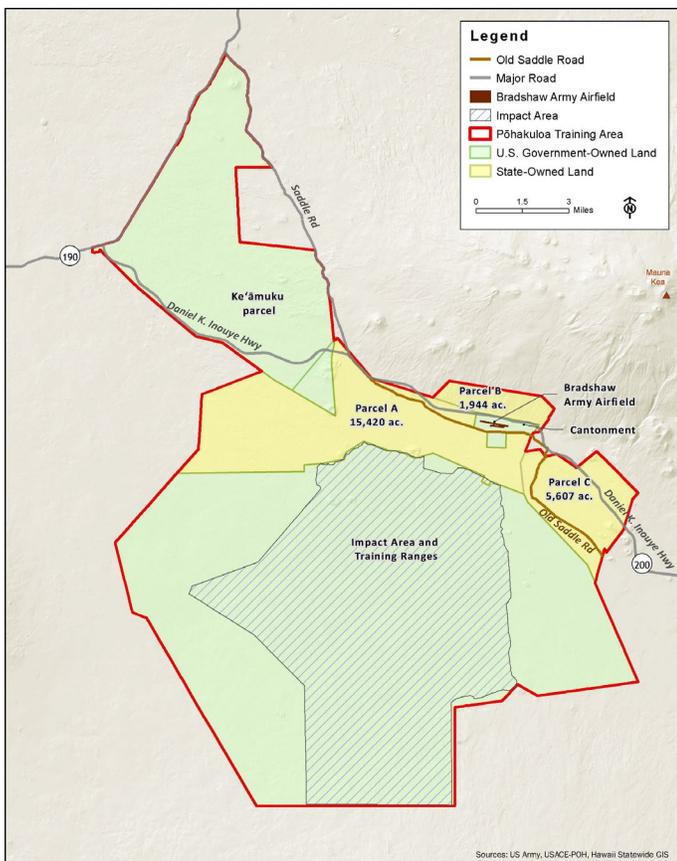
U.S. ARMY

# ARMY TRAINING LAND RETENTION AT PŌHAKULOĀ TRAINING AREA

## ENVIRONMENTAL IMPACT STATEMENT

The Army prepared a Draft Environmental Impact Statement (EIS) for Army Training Land Retention at Pōhakuloā Training Area (PTA) on the island of Hawai'i. The Proposed Action is to retain up to approximately 23,000 acres of State-owned land at PTA.

The Army prepared the Draft EIS under the National Environmental Policy Act (NEPA), guided by the Council on Environmental Quality NEPA implementing regulations in Title 40 Code of Federal Regulations (C.F.R.) Parts 1500–1508, and Army NEPA implementing regulations in Title 32 C.F.R. Part 651. The Draft EIS also complies with Hawai'i Revised Statutes Chapter 343 and Hawai'i Administrative Rules Chapter 11-200.1, collectively referred to as the Hawai'i Environmental Policy Act (HEPA). Both NEPA and HEPA require government agencies to fully consider the environmental impacts of a proposed major action and to take appropriate steps, where necessary, to mitigate potential adverse effects.



## PROPOSED ACTION AND ALTERNATIVES

The Draft EIS evaluated the potential direct, indirect, and cumulative impacts of three reasonable alternatives that meet the purpose and need of the Proposed Action, which is to retain up to approximately 23,000 acres of State-owned land at PTA in support of continued military training to meet ongoing training requirements. Alternatives analyzed in the EIS include: (1) Full Retention (of approximately 23,000 acres); (2) Modified Retention (of approximately 19,700 acres); and (3) Minimum Retention and Access (of approximately 10,100 acres and 11 miles of roads and training trails). The No Action Alternative (no retention of State-owned land after 2029) was also analyzed. Comments received on the Draft EIS will help shape updates and a preferred alternative for the Final EIS.

## BACKGROUND

PTA consists of approximately 132,000 acres between the volcanic mountains of Mauna Loa, Mauna Kea, and Hualālai on the island of Hawai'i. United States Army Hawaii (USARHAW) conducts training at PTA to meet its federally mandated mission of readiness. Training offered at installations such as PTA supports the Army's fulfillment of its role in the Nation's defense. Users of PTA, including the Army, U.S. Marine Corps, U.S. Navy, U.S. Air Force, U.S. Army Reserve, Hawaii Army National Guard, Hawaii Air National Guard, State and County of Hawai'i first responders and firefighters, Hawai'i Civil Defense Agency, Hawai'i Emergency Management Agency, State Office of Homeland Security, Hawai'i Police Department, and others, rely on the installation to fulfill agency-specific mission and readiness requirements. PTA is the largest contiguous live-fire range and maneuver training area in Hawai'i and is considered a premier military training center in the Pacific region. It is the only training area in Hawai'i where USARHAW units can complete all mission essential tasks, and the only installation in Hawai'i that can accommodate larger than company-sized units (i.e., battalion and brigade) for live-fire and maneuver exercises.

The U.S. Government leases approximately 23,000 acres at PTA from the State. The 65-year lease expires on August 16, 2029. Over the past six decades, the State-owned land has been the keystone of PTA, supporting numerous training facilities and capabilities essential to USARHAW and other military services and local agencies. The State-owned land contains maneuver area and key training facilities, some of which are not available elsewhere in Hawai'i, and provides access between major parcels of U.S. Government-owned land at PTA. Loss of this land would substantially impact the ability of USARHAW and other service components and local agencies to meet their training requirements and mission of readiness.

### FOR MORE INFORMATION OR ACCESSIBILITY REQUESTS

Please contact Michael Donnelly, External Communications

Email: [michael.o.donnelly.civ@army.mil](mailto:michael.o.donnelly.civ@army.mil); Phone: (808) 656-3160



U.S. ARMY

# ARMY TRAINING LAND RETENTION AT PŌHAKULOĀ TRAINING AREA

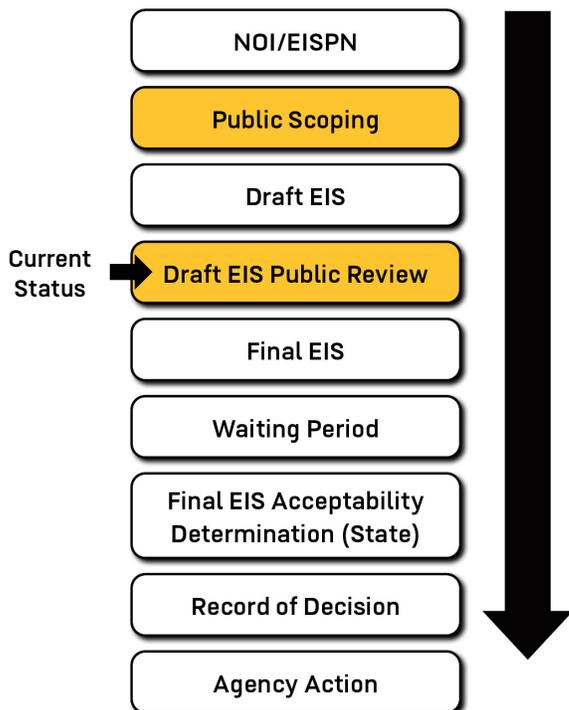
## NEPA/HEPA PUBLIC PARTICIPATION PROCESS

The first step in the NEPA/HEPA public notification process is to alert the public of the intention to prepare an EIS. On September 4, 2020, the Army published the Notice of Intent (NOI) in the Federal Register, which started the 40-day public scoping period. On September 8, 2020, the Army published an EIS Preparation Notice (EISPN) in the State Environmental Review Program's publication, The Environmental Notice. On September 23, 2020, the Army amended the NOI.

The second step in the public notification process is to prepare a Notice of Availability (NOA) for the Draft EIS. On April 8, 2022, the Army published the NOA in the Federal Register. The publication announced availability of the Draft EIS and the start of the public review and comment period. Additionally, the publication provided information on ways in which the public can review and comment on the Draft EIS. After written comments on the Draft EIS have been reviewed and considered, the Army will prepare a Final EIS.

The NEPA/HEPA process graphic (below) shows opportunities for public input in gold. The Public Scoping period ran from September 4, 2020 to October 14, 2020. The Draft EIS is available and is currently in the Draft EIS Public Review period, which began on April 8, 2022 and ends on June 7, 2022.

### NEPA/HEPA PROCESS



## DRAFT EIS PUBLIC REVIEW PROCESS

The intent of the Draft EIS Public Review process is to provide the public with information and the opportunity to review the Draft EIS and provide their comments in order to affect changes that may be implemented in the Final EIS. The Draft EIS describes alternatives for the Proposed Action and assesses impacts, which are subject to public review over a 45-day period. Among other things, input from the public can aid the Army in determining a preferred alternative that will be presented in the Final EIS.

The Army provided notification of the availability of the Draft EIS to Native Hawaiian organizations; Federal, State, and local agencies and officials; and other stakeholders. The Draft EIS and informational materials are available on the EIS website at: <https://home.army.mil/hawaii/index.php/PTAEIS>. Furthermore, the public may also review the Draft EIS at the following local libraries:

1. Hawai'i State Library, Hawai'i Documents Center
2. Hilo Public Library
3. Kailua-Kona Public Library
4. Thelma Parker Memorial Public and School Library

The Draft EIS public review process began April 8, 2022, with publication of the NOA in the Federal Register. Federal, State, and local agencies; Native Hawaiian organizations; and the public are invited to participate in the Draft EIS public review process. The 60-day public comment period ends on June 7, 2022.

### OPTIONS TO SUBMIT COMMENTS

The Draft EIS Public Comment period is April 8 – June 7, 2022.

- In-person: attend a public meeting
- EIS website: <https://home.army.mil/hawaii/index.php/PTAEIS>
- Email: [atlr-pta-eis@g70.design](mailto:atlr-pta-eis@g70.design)
- Phone: (808) 470-8884 (April 25-26 only)
- Mail: ATLR PTA EIS Comments  
P.O. Box 3444  
Honolulu, HI 96801-3444

Note: All comments will be valued equally, regardless of how they are submitted. Personal contact information will not be published in the Final EIS. Personal contact information will be maintained for the project record and will not be released unless required by law.

### DRAFT EIS PUBLIC MEETINGS

Public meetings will take place at the following locations on the following dates and times:

1. 'Imiloa Astronomy Center on April 25, 2022 from 6-8 PM HST
2. Waimea District Park on April 26, 2022 from 6-8 PM HST

The public will have the option to watch the Draft EIS Public Meetings in real time via a live stream that can be accessed on the EIS website at:

<https://home.army.mil/hawaii/index.php/PTAEIS>.



Scan with smartphone to be directed to the PTA EIS website.

**Flyer**





# ARMY TRAINING LAND RETENTION AT PŌHAKULOĀ TRAINING AREA

## ARMY SEEKS PUBLIC COMMENTS ON DRAFT ENVIRONMENTAL IMPACT STATEMENT

The Army has prepared a Draft Environmental Impact Statement (EIS) for Army Training Land Retention at Pōhākuloā Training Area (PTA) on the island of Hawai'i. The Army proposes to retain up to approximately 23,000 acres of State-owned land at PTA. Military training has taken place at PTA since it was established in 1956.

The Army prepared the Draft EIS under the National Environmental Policy Act (NEPA), guided by the Council on Environmental Quality NEPA implementing regulations in Title 40 Code of Federal Regulations (C.F.R.) Parts 1500–1508, and Army NEPA implementing regulations in Title 32 C.F.R. Part 651. The EIS also complies with Hawai'i Revised Statutes Chapter 343 and Hawai'i Administrative Rules Chapter 11-200.1, collectively referred to as the Hawai'i Environmental Policy Act (HEPA). Both NEPA and HEPA require government agencies to fully consider the environmental impacts of a proposed major action and to take appropriate steps, where necessary, to mitigate potential adverse effects.

## DRAFT EIS PUBLIC MEETINGS

Public meetings for the Draft EIS will provide information on alternatives that were analyzed, summarize potential impacts, and provide the public an opportunity to comment. The Draft EIS public comment period starts on April 8, 2022 and ends on June 7, 2022. Federal, state, and local agencies and officials; Native Hawaiian organizations; and the public are invited to participate in the Draft EIS public meetings and provide comments. The public meetings will be held at the following locations on the following dates and times:

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The public will have the option to watch the Draft EIS Public Meetings in real time via a live stream that can be accessed on the EIS website at: <https://home.army.mil/hawaii/index.php/PTAEIS>

## REVIEW PROJECT INFORMATION

The public may review the Draft EIS and meeting materials on the EIS website: <https://home.army.mil/hawaii/index.php/PTAEIS>. The Draft EIS also is available for review at the following libraries:

1. Hawai'i State Library, Hawai'i Documents Center
2. Hilo Public Library
3. Kailua-Kona Public Library
4. Thelma Parker Memorial Public and School Library

## OPTIONS TO SUBMIT COMMENTS

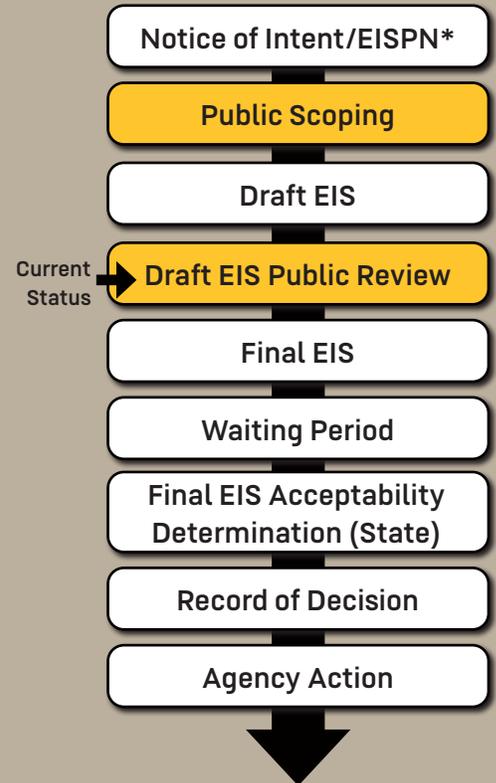
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- ▶ In-person: attend a public meeting
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- ▶ Email: [atlr-pta-eis@g70.design](mailto:atlr-pta-eis@g70.design)
- ▶ Phone: (808) 470-8884 (April 25-26 only)
- ▶ Mail: ATLR PTA EIS Comments  
P.O. Box 3444  
Honolulu, HI 96801-3444

Note: All comments will be valued equally, regardless of how they are submitted. Personal contact information will not be published in the Final EIS. Personal contact information will be maintained for the project record and will not be released unless required by law.

## NEPA/HEPA PUBLIC PARTICIPATION PROCESS

The NEPA/HEPA process graphic (below) shows opportunities for public input in gold.



Notice of Intent/EISPN\*

Public Scoping

Draft EIS

Current Status

Draft EIS Public Review

Final EIS

Waiting Period

Final EIS Acceptability Determination (State)

Record of Decision

Agency Action



Scan with smartphone to be directed to the PTA EIS website.

## FOR MORE INFORMATION OR ACCESSIBILITY REQUESTS

Michael Donnelly,  
External Communications  
Email: [michael.o.donnelly.civ@army.mil](mailto:michael.o.donnelly.civ@army.mil)  
Phone: (808) 656-3160

\* Environmental Impact Statement Preparation Notice



# **Direct Mail Postcard**





## ARMY TRAINING LAND RETENTION AT PŌHAKULOĀ TRAINING AREA

### Army seeks public comments on Draft Environmental Impact Statement (EIS)

The Army proposes to retain up to approximately 23,000 acres of State-owned land at Pōhakuoloa Training Area on the island of Hawai'i in support of continued military training. The Army has prepared a Draft EIS under the National Environmental Policy Act (NEPA) and the Hawai'i Environmental Policy Act (HEPA). Both NEPA and HEPA require government agencies to fully consider the environmental impacts of a proposed major action and to take appropriate steps, where necessary, to mitigate potential adverse effects. The Army is seeking public comments during the Draft EIS public comment period to provide information on the alternatives that were analyzed and potential impacts. The public comment period is from April 8 to June 7, 2022. Public meeting materials and other information about the Proposed Action are available on the EIS website at: <https://home.army.mil/hawaii/index.php/PTAEIS>.

#### OPTIONS TO SUBMIT COMMENTS

Comment period is April 8 – June 7, 2022.

- In-person: attend a public meeting
- EIS Website: <https://home.army.mil/hawaii/index.php/PTAEIS>
- Email: ATLR-PTA-EIS@g70.design
- Phone: (808) 470-8884 (April 25-26 only)
- Mail: ATLR PTA EIS Comments  
P.O. Box 3444  
Honolulu, HI 96801-3444

Federal, state, and local agencies and officials; Native Hawaiian organizations; and the public are invited to provide comments and participate in the Draft EIS public meetings, which will be held at the following locations on the following dates and times:

1. 'Imiloa Astronomy Center on April 25, 2022 from 6-8 PM HST
2. Waimea District Park on April 26, 2022 from 6-8 PM HST

The public will have the option to watch the Draft EIS Public Meetings in real time via a live stream that can be accessed on the EIS website at: <https://home.army.mil/hawaii/index.php/PTAEIS>.

*Note: All comments will be valued equally, regardless of how they are submitted. Personal contact information will not be published in the Final EIS. Personal contact information will be maintained for the project record and will not be released unless required by law.*

For further information, or for accessibility requests, contact:

Mike Donnelly, External Communications

Email: [michaelo.donnelly@army.mil](mailto:michaelo.donnelly@army.mil)

Phone: (808) 656-3160



NEPA Program Manager  
U.S. Army Garrison-Hawaii  
Directorate of Public Works - Environmental  
948 Santos Dumont Ave.  
Building 105, 3rd Floor  
Wheeler Army Airfield  
Schofield Barracks, HI 96857-5013

# **Second Draft EIS Public Meeting Materials**

**Posters**

**Fact Sheet**

**Flyer**

**Direct Mail Postcard**



## Posters



# Welcome to the Second Draft EIS Public Meeting



U.S. ARMY

## What are Second Draft EIS Public Meetings?

Based on comments received on the Draft EIS for Army Training Land Retention at Pōhakuoloa Training Area (PTA), the Army decided to refine the Proposed Action and alternatives and develop a Second Draft EIS. Second Draft EIS public meetings are conducted in compliance with National Environmental Policy Act (NEPA) and Hawai'i Environmental Policy Act (HEPA) to provide the public an opportunity to comment on the Second Draft EIS to aid Army developments of the Final EIS.

Public meetings allow the public to:

- Learn about changes since the Draft EIS and the Proposed Action and alternatives that were analyzed.
- Learn about potential impacts.
- Inform the Army of potential concerns.
- Recommend potential impacts that should be studied further.

The Second Draft EIS and additional materials are available on the EIS website at <https://home.army.mil/hawaii/ptaeis/project-home> as well as at four libraries: Hawai'i State Library, Hawai'i Documents Center; Hilo Public Library; Kailua-Kona Public Library; Thelma Parker Memorial Public and School Library.

## What to Expect after Public Comment Period?

After the public comment period has ended, the Army will consider all public input and incorporate substantive public input into the development of the Final EIS. The Army's decision will be documented in a Record of Decision made available to the public no sooner than 30 days following publication of the Final EIS.

Your input is valuable!

## Options to Submit Comments

Comment period is April 19, 2024 - June 7, 2024.

- In-person: attend a public meeting
- EIS website: <https://home.army.mil/hawaii/ptaeis/project-home>
- Email: [ATLR-PTA-EIS@g70.design](mailto:ATLR-PTA-EIS@g70.design)
- Phone: (808) 515-5518 (May 6 and 7 only)
- Mail: ATLR PTA EIS Comments  
P.O. Box 34444  
Honolulu, HI 96801-34444



Scan with smartphone  
to be directed to the  
PTA EIS website.

## Second Draft EIS Public Meetings

Federal, state, and local agencies and officials; Native Hawaiian organizations; and the public are invited to participate in the Second Draft EIS public meetings and provide comments, which will be held at the following locations on the following dates and times:

1. Waimea District Park, May 6, 6:00 - 8:00 PM.
2. 'Imiloa Astronomy Center, May 7, 6:00 - 8:00 PM.

The public may review the meeting materials and will have the option to watch the Second Draft EIS Public Meetings in real time via a live stream that can be accessed on the EIS website at: <https://home.army.mil/hawaii/ptaeis/project-home>.

*Note: All comments will be reviewed, regardless of how they are submitted. Personal contact information will not be published in the Final EIS. Personal contact information will be maintained for the project record and will not be released unless required by law.*



# National Environmental Policy Act (NEPA) and Hawai'i Environmental Policy Act (HEPA)

## NEPA

- NEPA is a U.S. law implemented via Title 40 Code of Federal Regulations, Parts 1500–1508.
- NEPA procedures ensure environmental information is available to public officials and citizens before decisions are made and before actions are taken.
- The Proposed Action is a federally funded real estate action.

## HEPA

- HEPA refers to the State EIS process: Hawai'i Revised Statutes Chapter 34-3, and Hawai'i Administrative Rules Chapter 11-200.1.
- HEPA establishes a system of environmental reviews to guide decision making.
- The Proposed Action includes State-owned land and will comply with HEPA processes.

The Second Draft EIS is a joint NEPA-HEPA document. Both public involvement processes will run concurrently.



Natural resource management at PTA  
Photo Credit: PTA

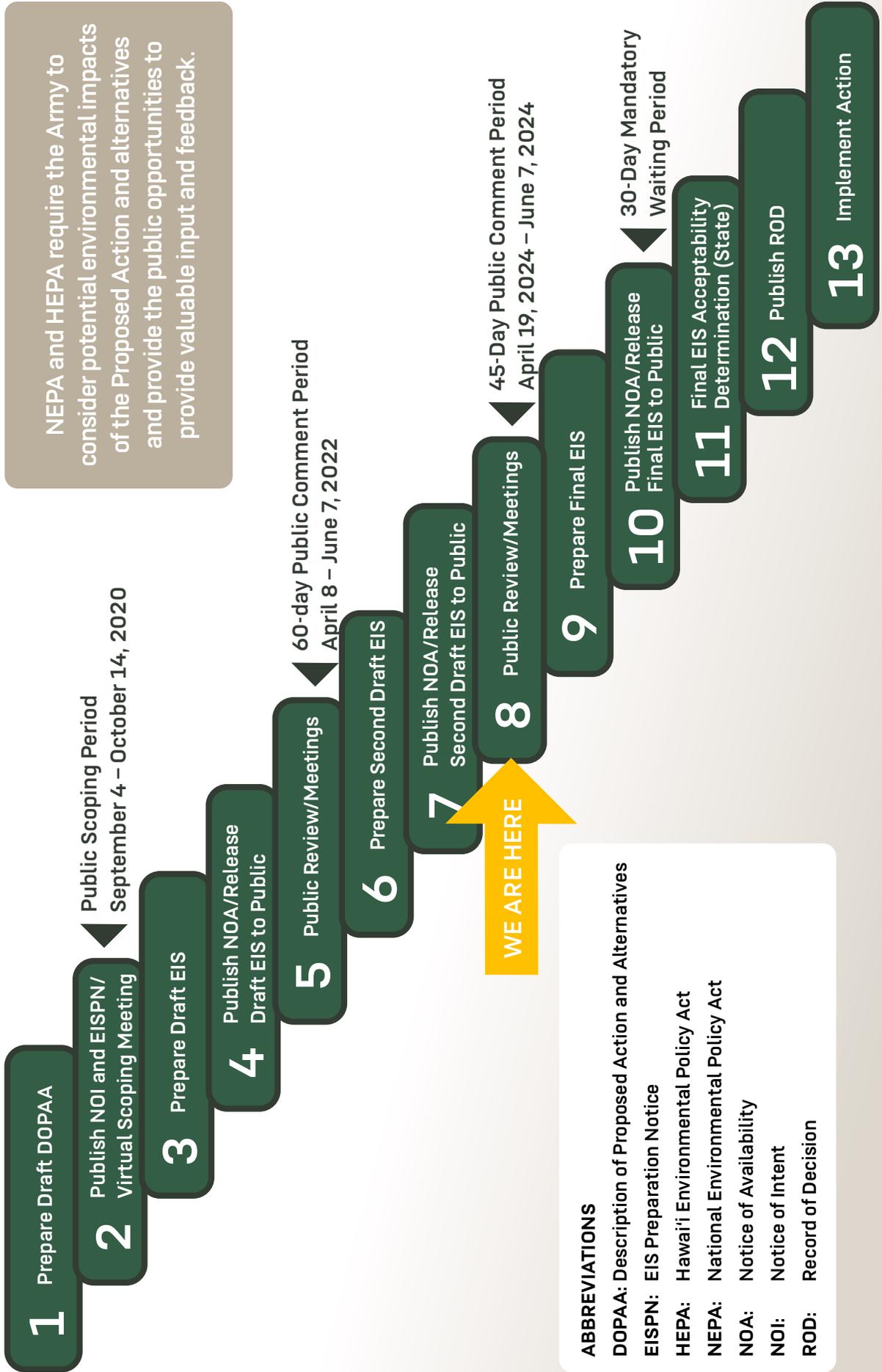
## NEPA/HEPA

Public involvement is a key component of the NEPA and HEPA processes. Opportunities include:

- A 40-day public scoping period that ran from September 4 to October 14, 2020.
- EIS Scoping Virtual Open House with oral comment phone line (September 23, 2020).
- HEPA Cultural Impact Assessment (completed January 2024).
- Draft EIS (Notice of Availability [NOA] on April 8, 2022) with a 60-day comment period (from April 8 – June 7, 2022) and public meetings that were held on April 25, 2022 at the Imiloa Astronomy Center and April 26, 2022 at the Waimea District Park.
- Second Draft EIS (NOA on April 19, 2024) with a comment period (from April 19, 2024 - June 7, 2024) and public meetings.



# EIS Process



**ABBREVIATIONS**  
DOPAA: Description of Proposed Action and Alternatives  
EISPN: EIS Preparation Notice  
HEPA: Hawai'i Environmental Policy Act  
NEPA: National Environmental Policy Act  
NOA: Notice of Availability  
NOI: Notice of Intent  
ROD: Record of Decision

# Military in Hawai'i and PTA



U.S. ARMY

## Hawai'i is Important to the Military

- Hawai'i is strategically important to national defense. Its location between the continental U.S. and the Indo-Pacific region serves as a logistics link and allows for rapid troop deployment.
- Hawai'i is home to U.S. Indo-Pacific Command, which has an area of responsibility that covers half the globe and more than 50% of the world's population.
- Hawai'i hosts the headquarters for U.S. Army Pacific, U.S. Pacific Fleet, U.S. Marine Corps Forces Pacific, Pacific Air Forces, and U.S. Special Operations Command Pacific.
- Hawai'i provides a range of training environments that cannot be replicated in other states, preparing troops to fight as they train.

## Military Economic Benefits to Hawai'i

- In 2021, there were 71,323 total defense personnel in the State.
- In FY 2019, the U.S. military paid \$5.0 billion in wages to defense personnel in the State.
- In FY 2019, overall defense spending in Hawai'i was \$7.5 billion.

## PTA is Important to the Military

- PTA is the only area in Hawai'i that supports larger unit (i.e., battalion and brigade) collective live-fire and maneuver training. It is the largest contiguous live-fire range and maneuver training area in Hawai'i, and the primary tactical training area in Hawai'i for units conducting mission essential tasks and training requirements.
- PTA supports joint and multi-national exercises critical to ensure that the U.S. military and allied nations know how to cooperatively work together.
- PTA is the only training area in Hawai'i where military units can use weapons systems at maximum capabilities to complete training requirements.
- PTA is used by the U.S. Army, U.S. Marine Corps, U.S. Navy, U.S. Air Force, U.S. Army Reserve, Hawaii Army National Guard, Hawaii Air National Guard, Hawai'i Police Department and others.



Cmd. Sgt. Maj. Jessica Cho, PTA Garrison CSM, Lt. Col. Tim Alvarado, PTA Garrison Commander Miles Yoshioka and Carla Kuo, Hawai'i Island Chamber of Commerce; Civil Air Patrol cadets from Hilo and Kona; Tropic Lightning Soldiers in local parade. Photo Credit: PTA



U.S. ARMY

# Why Retain State-owned Land at PTA?

## LEASE IS EXPIRING

The U.S. Government leases approximately 23,000 acres of PTA from the State. The Army has been training at PTA for the past six decades. The lease expires in 2029.

## STATE-OWNED LAND ESSENTIAL TO PTA

The State-owned land is the connective tissue of PTA, providing access among major parcels of U.S. Government-owned land in PTA and supporting training facilities, maneuver areas and capabilities that are essential to U.S. Army Hawaii and other military services and local agencies.

## TRAINING AT PTA SAVES LIVES

Properly trained military personnel are prepared for their mission and return home from deployments to their families.

### Examples of Training Facilities on State-owned Land



Military Operations in Urban Terrain Facility. Photo Credit: HDR



Firing Point. Photo Credit: PTA



Battle Area Complex (BAX). Photo Credit: PTA



# Draft EIS vs. Second Draft EIS

The Second Draft EIS includes substantial revisions to the EIS in response to agency and public comments on the Draft EIS published in 2022. The following is a list of the primary revisions:

## PROPOSED ACTION AND ALTERNATIVES

- Proposed Action no longer includes retention of approximately 250 acres of State-owned land administered by the Department of Hawaiian Home Lands.
- Preferred Alternative (Alternative 2) identified at the end of Chapter 2.

## RETENTION ANALYSIS

- Chapter 3 provides detailed analysis of impacts to resources for land retained under fee simple title and land retained under a new lease.
- Appendix H added to highlight the land retention estate assumptions.

## NEPA DOCUMENTS, BEST MANAGEMENT PRACTICES, STANDARD OPERATING PROCEDURES, MANAGEMENT MEASURES, AND MITIGATION MEASURES

- Chapter 3 revised and Appendix E added to identify items noted above.

## NEPA-HEPA COMPLIANCE

- HEPA references added where applicable.
- Appendix A added to show EIS compliance with NEPA and HEPA.

## LAND USE

- Section clarifies that the future method of retention would be negotiated at fair market value and assumes that revenue would be used for State programs in accordance with Admission Act Section 5(f) and HRS 171-18, Public Land Trust.
- Section modified to discuss Proposed Action compatibility with HAR Chapter 13-5, Conservation District.

## HISTORIC AND CULTURAL RESOURCES AND CULTURAL PRACTICES

- Section clarifies that the EIS complies with the requirements of NEPA and HEPA and is not intended to address compliance requirements under NHPA or HRS Chapter 6E.
- Section revised with information from interviewees who responded to a second request for input in December 2022.

## ENVIRONMENTAL JUSTICE

- The EIS better characterizes the continued effects on Native Hawaiians in the broader context of inequity, cultural values, and access to culturally important sites, and provides mitigation measures as available.



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# Overview of the Proposed Action

## Proposed Action

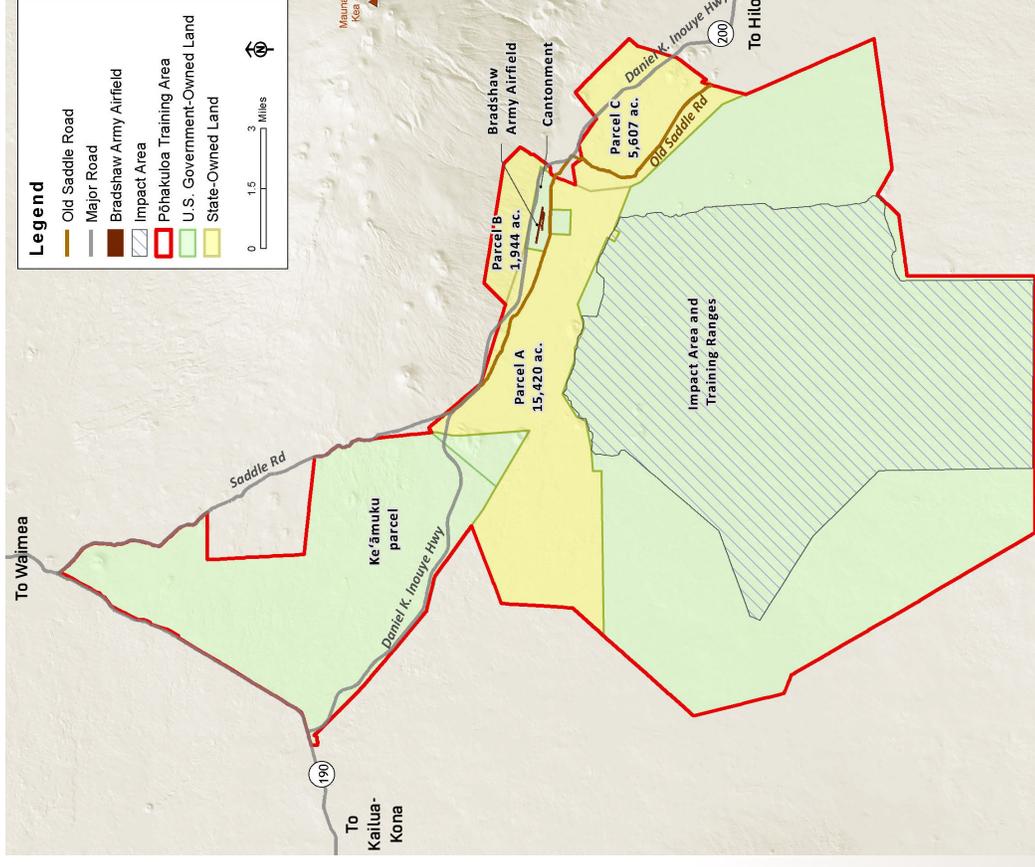
- To retain up to approximately 22,750 acres of the 23,000 acres of State-owned land at PTA in support of continued military training. Multiple land retention estates and methods could be used.
- To arrange for retention of the State-owned land prior to the end of the lease to prevent interruption of essential military training.
- After arrangement for retention of the State-owned land, the Army would continue its ongoing activities (training; facility, utility, and infrastructure maintenance and repair activities; resource management actions; and associated activities), and it would continue to coordinate ongoing activities by other PTA users.
- The Proposed Action does not include construction, modernization, or changes in ongoing activities. Instead, it is a real estate action that would enable continued military use of the State-owned land.

## Purpose of the Proposed Action

To enable U.S. Army Hawaii to continue to conduct military training on State-owned land within PTA to meet its ongoing training requirements.

## Need for the Proposed Action

To preserve limited maneuver area, provide austere environment training, enable access among major parcels of U.S. Government-owned land in PTA, retain substantial Army infrastructure investments, allow for future facility and infrastructure modernization, and maximize use of the impact area in support of U.S. Army Hawaii-coordinated training.



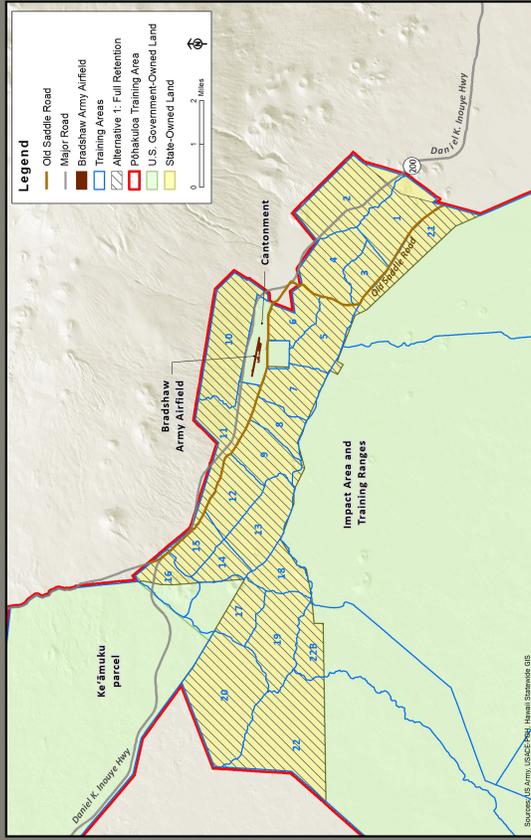
Sources: US Army, USACE-POH, Hawaii Statewide GIS

Map Credit: G70



# Alternatives 1 and 2

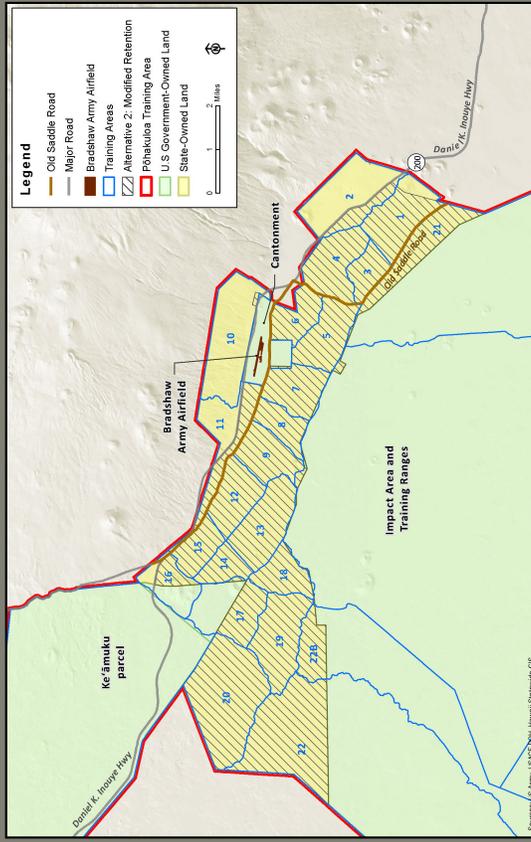
## Alternative 1: Maximum Retention



Map Credit: G70

Under Alternative 1, 22,750 acres of State-owned land would be retained. Additionally, the Army would retain all U.S. Government-owned utilities and associated access in the State-owned land.

## Alternative 2: Modified Retention



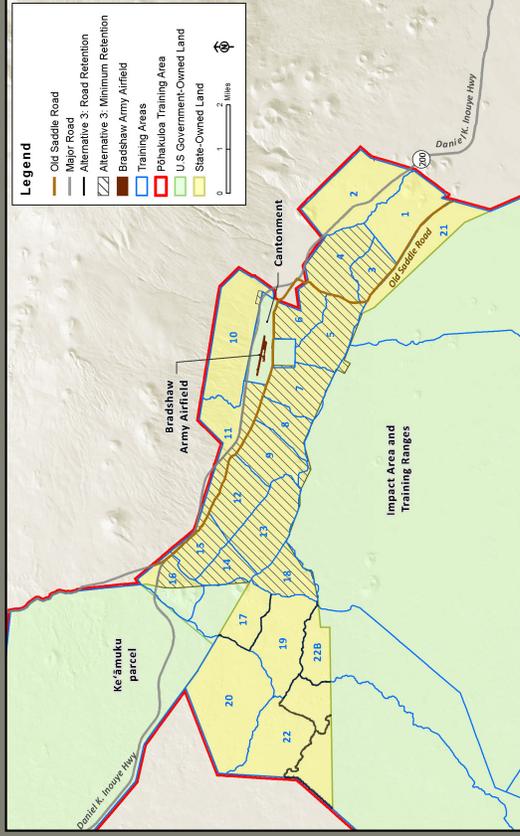
Map Credit: G70

Under Alternative 2, the Army would retain approximately 19,700 acres of the State-owned land at PTA. Additionally, the Army would retain all U.S. Government-owned utilities and associated access in the State-owned land. The Army's Preferred Alternative is Alternative 2.



# Alternative 3 and No Action Alternative

## Alternative 3: Minimum Retention and Access



Under Alternative 3, the Army would retain approximately 10,100 acres and 11 miles of select roads and training trails. Additionally, the Army would retain all U.S. Government-owned utilities and associated access, firebreak/fuel breaks and associated access along most of the select roads and training trails proposed for retention, and land use rights to enable firing of indirect-fire weapons from U.S. Government-owned land at PTA northwest of the State-owned land into the impact area.

## No Action Alternative

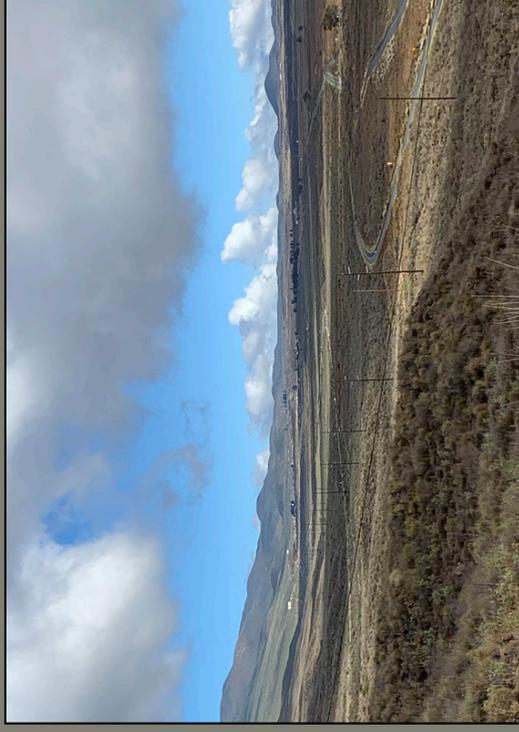


Photo Credit: G70

Under the No Action Alternative, the Army would not retain any of the State-owned land at PTA after lease expiration.



# Analyzed Environmental Topics

## Land Use



Land use compatibility, recreation, vistas, and encroachment management

## Biological Resources



Vegetation and wildlife, threatened and endangered species, invasive species, and wildland fires

## Historic and Cultural Resources and Cultural Practices



Archaeological and cultural resources, cultural practices, hunting, gathering, and cultural beliefs, uses, and access

## Hazardous Substances and Hazardous Wastes



Hazardous substances and wastes, petroleum products, storage tanks, munitions and explosives of concern, and depleted uranium

## Air Quality and Greenhouse Gases



Ambient Air Quality Standards, Prevention of Significant Deterioration, and dust

## Noise



Zones and community and wildlife impacts

## Geological & Soil Resources



Bedrock, seismology, volcanology, soil properties, and erosion

## Water Resources



Surface water and groundwater



# Analyzed Environmental Topics

## Socioeconomics



Demographics, housing, economic development, recreation

## Environmental Justice



Impacts on communities with environmental justice concerns and protection of children

## Transportation & Traffic



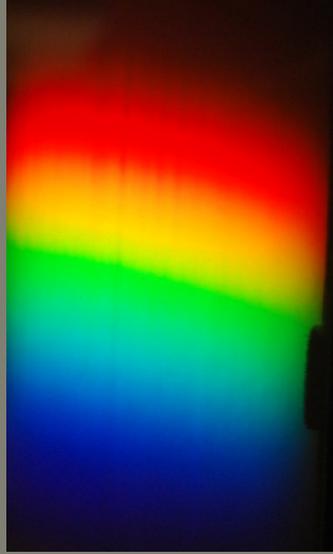
Roadways, air transportation, traffic volume and level of congestion

## Airspace



Controlled airspace, Special Use Airspace and Military Operation Areas

## Electromagnetic Spectrum



Radio waves to gamma waves, radio frequency, spectrum use, radar and satellite

## Utilities



Potable water, wastewater, stormwater, solid waste, electricity and communications

## Human Health & Safety



Health, safety and safety danger zones



# Potential Environmental Impacts

Resource	Alternative 1	Alternative 2	Alternative 3	No Action Alternative
Land Use	⊗/⊗/⊕/+	⊗/⊗/⊕/+	⊗/⊗/⊕/+	+
Biological Resources	⊗/⊗/⊗	⊗/⊗/⊗	⊗/⊗/⊗	⊗
Historic and Cultural Resources and Cultural Practices	⊙/⊙/⊙ ⊗/⊗/⊙	⊙/⊙/⊙ ⊗/⊗/⊙	⊙/⊙/⊙ ⊗/⊗/⊙	⊙ +
Hazardous Substances and Hazardous Wastes	⊙/⊙/⊙	⊙/⊙/⊙	⊙/⊙/⊙	⊙
Air Quality and Greenhouse Gases	⊙/⊙/⊙	⊙/⊙/⊙	⊙/⊙/⊙	⊙
Noise	⊙/⊙/⊙	⊙/⊙/⊙	⊙/⊙/⊙	⊙
Geology, Topography and Soils	⊙/⊙/⊙	⊙/⊙/⊙	⊙/⊙/⊙	⊙
Water Resources	⊙/⊙/⊙	⊙/⊙/⊙	⊙/⊙/⊙	⊙
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Environmental Justice	⊗/⊗/⊕	⊗/⊗/⊕	⊗/⊗/⊕	+
Transportation and Traffic	⊙/⊙/⊙	⊙/⊙/⊙	⊙/⊙/⊙	⊙
Airspace	⊙/⊙/⊙	⊙/⊙/⊙	⊙/⊙/⊙	⊙
Electromagnetic Spectrum	⊙/⊙/⊙	⊙/⊙/⊙	⊙/⊙/⊙	⊙
Utilities	⊙/⊙	⊙/⊙	⊙/⊙	⊗
Human Health and Safety	⊙/⊙/⊙	⊙/⊙/⊙	⊙/⊙/⊙	⊙

⊗ significant, adverse impact      ⊙ less than significant impact

⊙ significant, adverse impact but could be reduced      ⊕ significant, beneficial impact

Slash marks separate the level of impact for fee simple title, lease, and any land not retained in the corresponding Alternative.

ARMY TRAINING LAND RETENTION AT PÓHAKULOÁ TRAINING AREA  
SECOND DRAFT ENVIRONMENTAL IMPACT STATEMENT (EIS)



U.S. ARMY

# Thank You



# **Fact Sheet**





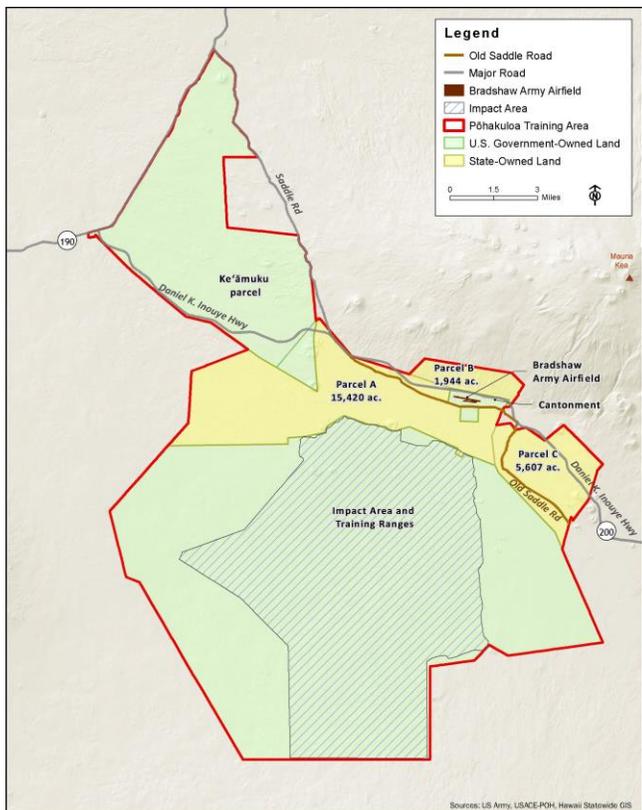
U.S. ARMY

# ARMY TRAINING LAND RETENTION AT PŌHAKULOĀ TRAINING AREA

## ENVIRONMENTAL IMPACT STATEMENT

In 2022, the Army published a Draft Environmental Impact Statement (EIS) for Army Training Land Retention at Pōhakuloā Training Area (PTA) on the island of Hawai'i. Based on comments received during the public comment period, the Army decided to refine the Proposed Action and alternatives and develop a Second Draft EIS. The Proposed Action has been revised to retain up to approximately 22,750 acres of the 23,000 acres of State-owned land at PTA; additional studies and analysis have also been incorporated into the Second Draft EIS.

The Army prepared the EIS under the National Environmental Policy Act (NEPA), guided by the Council on Environmental Quality NEPA implementing regulations in Title 40 Code of Federal Regulations (CFR) Parts 1500–1508, and Army NEPA implementing regulations in Title 32 CFR Part 651. The Second Draft EIS also complies with Hawai'i Revised Statutes Chapter 343 and Hawai'i Administrative Rules Chapter 11-200.1, collectively referred to as the Hawai'i Environmental Policy Act (HEPA). Both NEPA and HEPA require government agencies to fully consider the environmental impacts of a proposed action and to take appropriate steps, where necessary, to mitigate potential adverse effects.



## PROPOSED ACTION AND ALTERNATIVES

The Second Draft EIS evaluated the potential direct, indirect, and cumulative impacts of three reasonable alternatives that meet the purpose and need of the Proposed Action, which is to retain up to approximately 22,750 acres of State-owned land at PTA in support of continued military training to meet ongoing training requirements. Alternatives analyzed in the EIS include: (1) Alternative 1: Maximum Retention (of approximately 22,750 acres); (2) Alternative 2: Modified Retention (of approximately 19,700 acres); and (3) Alternative 3: Minimum Retention and Access (of approximately 10,100 acres and 11 miles of roads and training trails). The No Action Alternative (no retention of State-owned land after 2029) was also analyzed. The Army's Preferred Alternative is Alternative 2: Modified Retention. Comments received on the Second Draft EIS will help shape updates for the Final EIS.

## BACKGROUND

PTA consists of approximately 132,000 acres between the volcanic mountains of Mauna Loa, Mauna Kea, and Hualālai on the island of Hawai'i. United States Army Hawaii (USARHAW) conducts training at PTA to meet its federally mandated mission of readiness. Training offered at installations such as PTA supports the Army's fulfillment of its role in the Nation's defense. Users of PTA, including the Army, U.S. Marine Corps, U.S. Navy, U.S. Air Force, U.S. Army Reserve, Hawaii Army National Guard, Hawaii Air National Guard, State and County of Hawai'i first responders and firefighters, Hawai'i Civil Defense Agency, Hawai'i Emergency Management Agency, State Office of Homeland Security, Hawai'i Police Department, and others, rely on the installation to fulfill agency-specific mission and readiness requirements. PTA is the largest contiguous live-fire range and maneuver training area in Hawai'i and is considered a premier military training center in the Pacific region. It is the only training area in Hawai'i where USARHAW units can complete all mission essential tasks, and the only installation in Hawai'i that can accommodate larger than company-sized units (i.e., battalion and brigade) for live-fire and maneuver exercises.

The U.S. Government leases approximately 23,000 acres at PTA from the State. The 65-year lease expires on August 16, 2029. Over the past six decades, the State-owned land has been the keystone of PTA, supporting numerous training facilities and capabilities essential to USARHAW and other military services and local agencies. The State-owned land contains maneuver area and key training facilities, some of which are not available elsewhere in Hawai'i, and provides access among major parcels of U.S. Government-owned land at PTA. Loss of this land would substantially impact the ability of USARHAW and other service components and local agencies to meet their training requirements and mission of readiness.

**FOR MORE INFORMATION OR ACCESSIBILITY REQUESTS**  
Please contact USAG-HI PAO, NEPA  
Email: [usarmy.hawaii.nepa@army.mil](mailto:usarmy.hawaii.nepa@army.mil); Phone: (808) 787-2140



U.S. ARMY

# ARMY TRAINING LAND RETENTION AT PŌHAKULOĀ TRAINING AREA

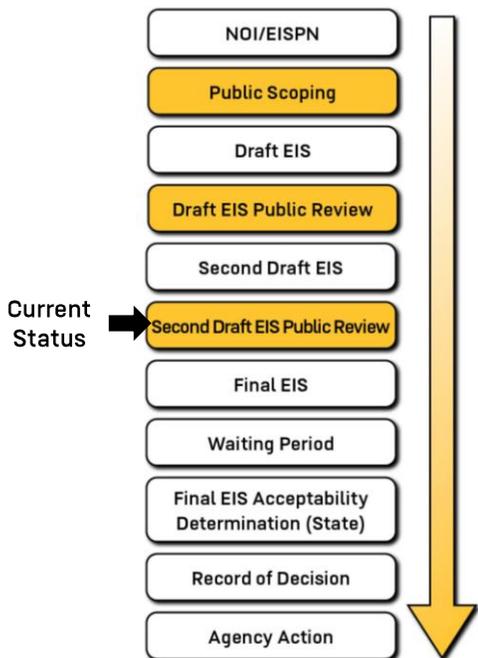
## NEPA/HEPA PUBLIC PARTICIPATION PROCESS

The NEPA/HEPA process graphic (below) shows opportunities for public input.

The first step in the NEPA/HEPA public notification process is to alert the public of the intention to prepare an EIS. On September 4, 2020, the Army published the Notice of Intent (NOI) in the Federal Register, which started the 40-day public scoping period. On September 8, 2020, the Army published an EIS Preparation Notice (EISPN) in the State Environmental Review Program's publication, The Environmental Notice. On September 23, 2020, the Army amended the NOI to modify the public scoping process due to the COVID-19 pandemic.

The second step in the public notification process is to prepare a Notice of Availability (NOA) for the Draft EIS. On April 8, 2022, the Army published the NOA in the Federal Register. The publication announced availability of the Draft EIS and the start of the public review and comment period. Additionally, the publication provided information on ways in which the public could review and comment on the Draft EIS. With critical evaluation of comments on the Draft EIS, the Army determined a Second Draft EIS is warranted. A NOA for the Second Draft EIS was published in the Federal Register on April 19, 2024, initiating the public review period.

## NEPA/HEPA PROCESS



Opportunities for public input are shown in yellow boxes.

## SECOND DRAFT EIS PUBLIC REVIEW PROCESS

The intent of the Second Draft EIS public review process is to provide the public with additional information and changes since the Draft EIS, and the opportunity to review the Second Draft EIS and provide comments in order to affect changes that may be implemented in the Final EIS. The Second Draft EIS describes alternatives for the Proposed Action and assesses potential impacts, which are subject to public review from April 19 through June 7, 2024.

The Army provided notification of the availability of the Second Draft EIS to Native Hawaiian organizations; Federal, State, and local agencies and officials; and other stakeholders. The Second Draft EIS and informational materials are available on the EIS website at: <https://home.army.mil/hawaii/ptaais/project-home>. Furthermore, the public may also review the Second Draft EIS at the following local libraries:

1. Hawai'i State Library, Hawai'i Documents Center
2. Hilo Public Library
3. Kailua-Kona Public Library
4. Thelma Parker Memorial Public and School Library

The Second Draft EIS public review process began April 19, 2024, with publication of the NOA in the Federal Register. Federal, State, and local agencies and officials; Native Hawaiian organizations; and the public are invited to participate in the Second Draft EIS public review process. The comment period is April 19 through June 7, 2024.

## OPTIONS TO SUBMIT COMMENTS

The Second Draft EIS public comment period is April 19 – June 7, 2024.

- In-person: Attend a public meeting
- EIS website: <https://home.army.mil/hawaii/ptaais/project-home>
- Email: [ATLR-PTA-EIS@g70.design](mailto:ATLR-PTA-EIS@g70.design)
- Phone: (808) 515-5518 (May 6 - 7 only)
- Mail: ATLR PTA EIS Comments  
P.O. Box 3444  
Honolulu, HI 96801-3444

*Note: All comments will be reviewed regardless of how they are submitted. Personal contact information will not be published in the Final EIS. Personal contact information will be maintained for the project record and will not be released unless required by law.*

## SECOND DRAFT EIS PUBLIC MEETINGS

Public meetings will take place at the following locations on the following dates and times:

1. Waimea District Park on May 6, 2024, 6:00–8:00 PM
2. 'Imiloa Astronomy Center on May 7, 2024, 6:00–8:00 PM

The public may review the meeting materials and will have the option to watch the Second Draft Public Meetings in real time via a live stream that can be accessed on the EIS website at: <https://home.army.mil/hawaii/ptaais/project-home>.



Scan with smartphone to be directed to the PTA EIS website.

### FOR MORE INFORMATION OR ACCESSIBILITY REQUESTS

Please contact USAG-HI PAO, NEPA

Email: [usarmy.hawaii.nepa@army.mil](mailto:usarmy.hawaii.nepa@army.mil); Phone: (808) 787-2140

**Flyer**





# ARMY TRAINING LAND RETENTION AT PŌHAKULOĀ TRAINING AREA

## ARMY SEEKS PUBLIC COMMENTS ON SECOND DRAFT ENVIRONMENTAL IMPACT STATEMENT

Based on comments received on the Draft Environmental Impact Statement (EIS) for Army Training Land Retention at Pōhakuloa Training Area (PTA) on the island of Hawai'i, the Army decided to refine the Proposed Action and alternatives and develop a Second Draft EIS. The Army proposes to retain up to approximately 22,750 acres of State-owned land at PTA. Military training has taken place at PTA since it was established in 1956.

The Army prepared the Second Draft EIS under the National Environmental Policy Act (NEPA), guided by the Council on Environmental Quality NEPA implementing regulations in Title 40 Code of Federal Regulations (CFR) Parts 1500–1508, and Army NEPA implementing regulations in Title 32 CFR Part 651. The EIS also complies with Hawai'i Revised Statutes Chapter 343 and Hawai'i Administrative Rules Chapter 11-200.1, collectively referred to as the Hawai'i Environmental Policy Act (HEPA). Both NEPA and HEPA require government agencies to fully consider the environmental impacts of a proposed action and to take appropriate steps, where necessary, to mitigate potential adverse effects.

## REVIEW PROJECT INFORMATION

The public may review the Second Draft EIS and meeting materials on the EIS website: <https://home.army.mil/hawaii/ptaeis/project-home>. The Second Draft EIS also is available for review at the following libraries:

1. Hawai'i State Library, Hawai'i Documents Center
2. Hilo Public Library
3. Kailua-Kona Public Library
4. Thelma Parker Memorial Public and School Library

## SECOND DRAFT EIS PUBLIC MEETINGS

Public meetings for the Second Draft EIS will provide information on alternatives that were analyzed, summarize potential impacts, and provide the public an opportunity to comment. The Second Draft EIS public comment period starts on April 19, 2024 and ends on June 7, 2024. Federal, state, and local agencies and officials; Native Hawaiian organizations; and the public are invited to participate in the Second Draft EIS public meetings and provide comments. The public meetings will be held at the following locations on the following dates and times:

1. Waimea District Park, May 6, 6:00 - 8:00 PM
2. 'Imiloa Astronomy Center, May 7, 6:00 - 8:00 PM

The public may review the meeting materials and will have the option to watch the Second Draft Public Meetings in real time via a live stream that can be accessed on the EIS website at: <https://home.army.mil/hawaii/ptaeis/project-home>.

## OPTIONS TO SUBMIT COMMENTS

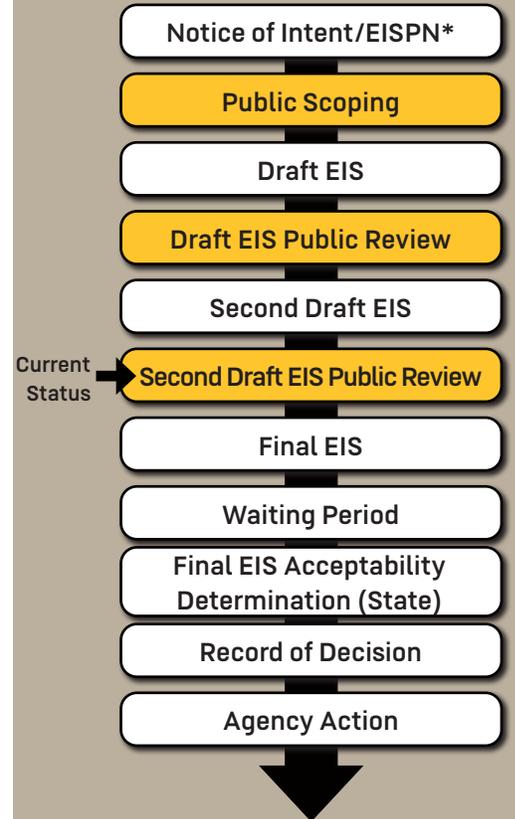
The Second Draft EIS Public Comment period is April 19, 2024 - June 7, 2024.

- ▶ In-person: Attend a public meeting
- ▶ EIS website: <https://home.army.mil/hawaii/ptaeis/project-home>
- ▶ Email: [ATLR-PTA-EIS@g70.design](mailto:ATLR-PTA-EIS@g70.design)
- ▶ Phone: (808) 515-5518 (May 6 and 7 only)
- ▶ Mail: ATLR PTA EIS Comments  
P.O. Box 3444  
Honolulu, HI 96801-3444

Note: All comments will be reviewed, regardless of how they are submitted. Personal contact information will not be published in the Final EIS. Personal contact information will be maintained for the project record and will not be released unless required by law.

## NEPA/HEPA PUBLIC PARTICIPATION PROCESS

The NEPA/HEPA process graphic shows opportunities for public input in gold.



Scan with smartphone to be directed to the PTA EIS website.

## FOR MORE INFORMATION OR ACCESSIBILITY REQUESTS

USAG-HI PAO, NEPA  
Email: [usarmy.hawaii.nepa@army.mil](mailto:usarmy.hawaii.nepa@army.mil)  
Phone: (808) 787-2140

\* Environmental Impact Statement Preparation Notice



# **Direct Mail Postcard**





## ARMY TRAINING LAND RETENTION AT PŌHAKULOĀ TRAINING AREA

### U.S. ARMY

### Army Seeks Public Comments on Second Draft Environmental Impact Statement (EIS)

The Army proposes to retain up to approximately 22,750 acres of State-owned land at Pōhakuloa Training Area on the island of Hawai'i in support of continued military training. The Army has prepared a Second Draft EIS under the National Environmental Policy Act (NEPA) and the Hawai'i Environmental Policy Act (HEPA). Both NEPA and HEPA require government agencies to fully consider the environmental impacts of a proposed action and to take appropriate steps, where necessary, to mitigate potential adverse effects. The Army is seeking public comments during the Second Draft EIS public comment period from April 19, 2024 - June 7, 2024 to provide information on the alternatives that were analyzed and potential impacts. Public meeting materials and other information about the Proposed Action are available on the EIS website at: <https://home.army.mil/hawaii/ptaeis/project-home>.

#### OPTIONS TO SUBMIT COMMENTS

Comment period is April 19, 2024 - June 7, 2024.

- In-person: attend a public meeting
- EIS Website: <https://home.army.mil/hawaii/ptaeis/project-home>
- Email: [ATLR-PTA-EIS@g70.design](mailto:ATLR-PTA-EIS@g70.design)
- Phone: (808) 515-5518 (May 6 and 7 only)
- Mail: ATLR PTA EIS Comments  
P.O. Box 3444  
Honolulu, HI 96801-3444

For further information, or for accessibility requests, contact:  
USAG-HI PAO, NEPA  
Email: [usarmy.hawaii.nepa@army.mil](mailto:usarmy.hawaii.nepa@army.mil)  
Phone: (808) 787-2140

#### Second Draft EIS Public Meetings

Federal, state, and local agencies and officials; Native Hawaiian organizations; and the public are invited to provide comments and participate in the Second Draft EIS public meetings, which will be held at the following locations on the following dates and times:

1. Waimea District Park, May 6, 6:00-8:00 PM
2. 'Imiloa Astronomy Center, May 7, 6:00-8:00 PM

The public will have the option to watch the Second Draft Public Meetings in real time via a live stream that can be accessed on the EIS website at: <https://home.army.mil/hawaii/ptaeis/project-home>.

*Note: All comments will be reviewed, regardless of how they are submitted. Personal contact information will not be published in the Final EIS. Personal contact information will be maintained for the project record and will not be released unless required by law.*



**U.S. ARMY**

NEPA Program  
U.S. Army Garrison-Hawaii  
Directorate of Public Works - Environmental  
948 Santos Dumont Ave.  
Building 105, 3rd Floor  
Wheeler Army Airfield  
Schofield Barracks, HI 96857-5013

# **Scoping and Draft EIS Responses**

**Responses to Scoping**

**Responses to Draft EIS Comments**

**Responses to Second Draft EIS Comments**



# **Responses to Scoping Comments**



# Army Training Land Retention at Pōhakuloa Training Area EIS Responses to Scoping Comments

This section of the appendix provides responses to substantive comments received during the 40-day public comment period on the NOI and EISPN from September 4 to October 14, 2020. The topics raised during the scoping comment period are grouped into the following categories: Purpose of and Need for the Proposed Action; Description of Proposed Action and Alternatives; Affected Environment and Consequences; EIS Findings; and Plans and Policies. Multiple people commented on each of the topics and those who commented on each topic is listed below the heading. The Army response to the substantive comments raised is provided under each topic.

## Purpose of and Need for the Proposed Action

### NATIONAL SECURITY

*Army response to comments received from: Jody Brissette; Aaron Stene; David B. Gomes; Amanda Dillon; Helen Jaccard*

Pōhakuloa Training Area (PTA) is the primary tactical training area for United States Indo-Pacific Command (USINDOPACOM), which integrates United States (U.S.) Army, U.S. Navy, U.S. Air Force, and U.S. Marine Corps forces within the USINDOPACOM region to achieve U.S. national security objectives while protecting national interests. PTA provides training capabilities to support home-station training and joint training with other U.S. and multinational military units and supports U.S. military activities throughout the Indo-Pacific theater. PTA also supports U.S. Army Pacific's Joint Pacific Multinational Readiness Capability for a high fidelity, joint and multinational maneuver and live-fire training venue as well as robust after-action reviews.

PTA's mission includes providing modernized training features and facilities for the U.S. Army Pacific and other USINDOPACOM units that train at PTA. These units require a full suite of ranges and maneuver training areas that support live-fire and non-live-fire training requirements. Each soldier and weapon system crew is assigned an annual or semiannual live-fire training and qualification requirement. Facilities at PTA support units by providing doctrinally required training to achieve required readiness levels prior to deployment. PTA is the only U.S. military training facility in the Pacific region where U.S. Army Hawaii (USARHAW) units can complete all mission essential tasks, use weapons systems at maximum capabilities, and conduct larger than company-sized live-fire and maneuver exercises.

PTA must be able to continue to support the following:

1. three battalion level units physically on site
2. two battalions conducting training simultaneously with one battalion in support

3. one battalion conducting collective maneuver and live-fire training at company level or higher
4. one battalion conducting collective maneuver and live-fire training at crew through platoon levels, and situational training exercise lanes.

The State-owned land contains maneuver area and key training facilities, some of which are not available elsewhere in Hawai'i, and provides access between major parcels of U.S. Government-owned land in PTA. Loss of the State-owned land would substantially impact the ability of USARHAW and other military services in USINDOPACOM to meet their training requirements and mission of combat readiness. Without the ability to meet minimal training requirements at PTA, training capabilities for home-stationed troops in Hawai'i would be insufficient and therefore readiness levels in the USINDOPACOM region would be compromised.

### **HAWAI'I'S STRATEGIC LOCATION**

*Army response to comments received from: Mauna Kea Moku Nui 'Aelike/Consensus Building 'Ohana; Native Hawaiian Legal Corporation; Michael Linnolt; Arlene Larrua; Brandie Oye; Shelly Aina; Joseph Nobriga; Scott Malis; Sasha Davis; M. Kalani Souza; Charley Ice; Amanda Dillon; Sofronio Estores; Helen Jaccard*

Hawai'i is a strategic location for national defense and rapid deployment of military forces. The USINDOPACOM region is critical to National Security and covers more of the globe than - and shares borders with all - the other five geographic combatant commands. Army training facilities in Hawai'i provide a range of environments that cannot be replicated at other U.S. training areas located in the continental United States or Alaska, specifically the tropical climate typically found throughout the Indo-Pacific region, and the remote and austere high-altitude environment of PTA on the island of Hawai'i. There are significantly high financial costs associated with the transportation of Army personnel and equipment stationed in Hawai'i to train in the continental United States or Alaska.

PTA is the only training area in the State that is classified as a Major Training Area. Loss of the State-owned land would substantially impact the ability of USARHAW and other military services in USINDOPACOM to meet their training requirements and mission of combat readiness. Without the ability to meet minimal training requirements at PTA, training capabilities for home-stationed troops in Hawai'i would be insufficient and readiness levels in the USINDOPACOM region would be compromised. **Chapter 1** of the Draft Environmental Impact Statement (EIS) provides additional information on the importance of Hawai'i and PTA to the U.S. military.

Relocating training elsewhere does not satisfy the purpose and need for the Proposed Action. **Chapter 1** of the EIS describes the purpose and need for the Proposed Action, and **Chapter 2** describes the Proposed Action and identifies the alternatives considered in the EIS.

## EIS PROCESS

*Army response to comments received from: U.S. Environmental Protection Agency, Region 9 Environmental Review Branch; County of Hawaii Planning Department; Temple of Lono; Hawai'i Peace and Justice; Environmental Caucus of the Democratic Party of Hawai'i; Na Kupuna Moku O. Keawe; Sierra Club, Hawai'i Island Group; Judy Tiktinsky; Seanna Pieper-Jordan; Sofronio Estores; Helen Jaccard; Brenda Bailey-White; Kyle Kajihiro*

The EIS addresses National Environmental Policy Act of 1969 (NEPA) and Hawai'i environmental laws (Hawai'i Revised Statute [HRS] Chapter 343 and Hawai'i Administrative Rules [HAR] Chapter 11-200.1), collectively referred to as the Hawai'i Environmental Policy Act (HEPA). The Notice of Intent was published prior to the September 14, 2020, effective date of the update to the regulations implementing the procedural provisions of the NEPA; therefore, the EIS is being developed in accordance with Council on Environmental Quality and Army NEPA implementation regulations in Title 40 Code of Federal Regulations (CFR) Parts 1500-1508 (1978 version) and Title 32 CFR Part 651, respectively.

Under HEPA, HRS Chapter 343 identifies the accepting authority as the agency with the greatest responsibility for approving the Proposed Action. The State-owned land is held by the Hawai'i Department of Land and Natural Resources (DLNR) Land Division, so DLNR is the accepting authority for the EIS. So as to not overlook any potentially significant impacts, the accepting authority has authorized the applicant to prepare an EIS without first completing an Environmental Assessment, as allowed under HAR Section 11-200.1-14(d)(2).

The scoping process initiated by publication of the Notice of Intent and the Environmental Impact Statement Preparation Notice (EISPN) is described in **Chapter 1** of the EIS. **Chapter 8** lists all parties contacted as part of the scoping effort, and all those who provided comments.

The scoping process fulfilled the requirements of NEPA and HEPA implementation regulations. Project information was made publicly available on the U.S. Army Garrison-Hawaii website, and a contact name and telephone number were provided for requests of materials in a printed format. The Army decided not to hold in-person public scoping meetings to protect public health and safety due to the coronavirus (COVID-19) pandemic. National and local orders and proclamations in response to the pandemic in the U.S. included the County of Hawai'i Mayor's COVID-19 Emergency Rule No. 11 (dated August 25, 2020), the State of Hawai'i Office of the Governor's Twelfth Proclamation Related to the COVID-19 Emergency (dated August 20, 2020), and Army guidance. An online EIS Scoping Virtual Open House was held on September 23, 2020, and included the same components that would have been made available at an in-person open house event. The Army believes that sufficient information was provided during the public scoping period and provided four ways for the public to comment: oral comments via a telephone line during the Scoping Virtual Open House; and written comments via the website, email, or U.S. Postal Service mail throughout the 40-day scoping period.

What constitutes a substantive comment is defined under HEPA. In deciding whether a written comment is substantive, the Army considered the validity, significance and relevance of the comment to the scope, analysis or process of the EIS, as noted in HAR 11-200.1-26(a). The EIS includes all scoping comments received (**Appendix B**), and responses to the substantive topics are also provided.

## Description of Proposed Action and Alternatives

### PROPOSED ACTION

*Army response to comments received from: Sierra Club, Hawai'i Island Group; Mauna Kea Moku Nui 'Aelike/Consensus Building 'Ohana; Jeffrey Mermel; Jim Albertini; Amy Smith; Alexandra Bernstein; Mary Macmillan; Charles Ota; Seanna Pieper-Jordan; Sofronio Estores; Brenda Bailey-White; Dr. Noe Wong-Wilson*

The Proposed Action (i.e., retention of up to approximately 23,000 acres of State-owned land at PTA) is a real estate action (administrative action) that would enable continuation of ongoing activities on the retained State-owned land. It does not include construction, modernization, or changes in ongoing activities. Additionally, the Proposed Action does not include changes to the use, size, or configuration of the special use airspace overlying the State-owned land. Current ongoing activities within the State-owned land were previously analyzed in separate NEPA documents, as applicable, and future construction, modernization, or changes in ongoing activities within the retained State-owned land would require separate NEPA (and potentially HEPA) compliance, as applicable.

The Proposed Action does not include a timeline for the length of retention because the timeline is unknown and subject to future negotiations between the Army and the State based on the land retention estates available to the Army (i.e., title, lease, easement, and license).

In addition to the Proposed Action and alternatives, **Chapter 2** of the EIS provides a summary of the training areas, facilities, utilities, and infrastructure within the State-owned land; current activities conducted within the State-owned land; and land retention estates available to the Army. The purpose of and need for the Proposed Action are explained in **Chapter 1** of the EIS, and **Chapter 3** of the EIS details the affected environment, including region of influence, and potential environmental consequences of the Proposed Action alternatives.

### ALTERNATIVES

*Army response to comments received from: U.S. Environmental Protection Agency, Region 9 Environmental Review Branch; Temple of Lono; Hawai'i Peace and Justice; Mauna Kea Moku Nui 'Aelike/Consensus Building 'Ohana; Helen Jaccard; Brenda Bailey-White; Dr. Noe Wong-Wilson; Michael Jones*

The EIS analyzes potential impacts from implementation of the Proposed Action (general action of retention of the State-owned land) via a range of reasonable alternatives (specific actions for retention of

the State-owned land). The alternatives vary in extent and location of retention based on the areas and features that are most critical to the U.S. military. Therefore, the alternatives are based on usefulness or criticality of the land, facilities, utilities, and infrastructure to the U.S. military, not acreage. The alternatives are Alternative 1 (full retention), Alternative 2 (modified retention), Alternative 3 (minimum retention and access), and the No Action Alternative (no retention), and provide a reasonable range of alternatives, including reduced action alternatives. As with the Proposed Action, the alternatives do not include construction or changes in ongoing activities. Additionally, the alternatives do not include modernization of ranges, facilities, utilities, and infrastructure on the State-owned land but do not prohibit future modernization.

Where available, the alternatives in **Chapter 2** include quantitative information (e.g., acres, miles), and **Chapter 3** contains additional quantitative information for each of the alternatives. Because the State-owned land and various alternatives are only portions of PTA, the number of activities conducted within those areas is not known for all features (e.g., miles travelled on roads, air quality emissions from vehicles and munitions). In these instances, the alternatives present qualitative statements regarding the assumed level of activity reduction associated with each alternative based on the land, facilities, utilities, and infrastructure that would not be retained under each alternative.

Reasonable alternatives must satisfy the purpose of and need for the Proposed Action, and meet the screening criteria, which are based on the purpose and need statements. **Chapters 1 and 2** of the EIS elaborate on the Proposed Action purpose and need statements and the screening criteria, which have been consolidated and simplified. Alternatives 1, 2, and 3 adequately meet the purpose and need statements and all the screening criteria. Alternatives that were considered by the Army but do not adequately meet one or more of the screening criteria (i.e., Alternatives 4: Retention of Only Access, Utilities, and Infrastructure; Alternative 5: Retention with Limits on the Types of Training and Future Modernization; and Alternative 6: Short-term Retention) are addressed in **Chapter 2** of the EIS but are not carried forward for detailed analysis.

Prior to the initiation of the EIS, the Army evaluated alternatives to the Proposed Action (e.g., virtual-only training, relocation of training infrastructure from the State-owned land to other parts of PTA, move training to other areas within and outside of Hawai'i), which are briefly discussed in **Chapter 1** of the EIS. These alternatives are not reasonable alternatives because they are alternatives to implementing the Proposed Action, not alternatives for implementing the Proposed Action. These alternatives do not satisfy the purpose and need statements and do not meet the screening criteria and therefore are not discussed in **Chapter 2** of the EIS. Likewise, alternatives that are not associated with the Proposed Action (e.g., return all of PTA to the State, change training types) are not reasonable alternatives and are not discussed in **Chapter 2** of the EIS.

The alternatives do not incorporate the various land retention estates because the conditions that would be negotiated between the Army and State for each land retention estate are not known and it would be extremely cumbersome and difficult for readers to understand, particularly for alternatives that might work best with a combination of land retention estates. Therefore, to account for the range of potential

impacts that could result from the Proposed Action alternatives, the EIS analyzes potential impacts associated with obtaining title, which generally would have the potential to result in the greatest impacts because it would not involve the conditions that could be associated with the other land retention estates. As discussed in the EIS **Section 3.1**, the Army considered whether different land retention estates would have greater impacts than title but did not identify any instances where this would apply.

The alternatives described in **Chapter 2** of the EIS do not include mitigation measures or additional resource protections; however, **Chapter 3** of the EIS discusses current best management practices, standard operating procedures, and mitigation requirements for existing actions within the State-owned land as well as potential mitigation measures for the alternatives.

**Chapter 2** of the EIS provides a brief summary of potential impacts (reductions) on training under each alternative so all resource area analyses use the same assumptions. The Proposed Action alternatives do not include actions for accommodating training lost due to return of the State-owned land to the State. If the Army proposes actions in the future to accommodate lost training, it would require separate NEPA (and potentially HEPA) compliance.

Because the Proposed Action is a real estate action, not a training action, the alternatives do not contain specifics regarding type and number of munitions used within the State-owned land. Alternatives 2 and 3 and the No Action Alternative include reductions in the land retained by the military, which would reduce the levels and types of training that can be conducted within the State-owned land retained. The EIS qualitatively discusses the potential impacts of the various alternatives on training, including munitions use and safety.

Preferred Alternative: The Army will identify the preferred alternative in the Final EIS and Record of Decision.

Alternative 3: Alternative 3 is not limited to providing access through the State-owned land because that would not meet several elements of the purpose and need statements and several screening criteria. Consequently, Alternative 3 includes access and minimum retention of vital training and support facilities and associated maneuver areas necessary for USARHAW to continue to meet its current training requirements on the State-owned land.

**Chapter 2** of the EIS identifies and describes the areas proposed to be retained under Alternative 3. Alternative 3 continues to include land use rights to enable the firing of indirect-fire weapons from U.S. Government-owned land northwest of the State-owned land into the impact area to enable continued use of firing points that are among the furthest from the impact area. These firing points allow for long distance firing by indirect-fire weapons, which is essential for training. Land use rights associated with firing from these firing points over State-owned land not retained would consider necessary safety requirements.

## **NO ACTION ALTERNATIVE**

*Army response to comments received from: Temple of Lono; Environmental Caucus of the Democratic Party of Hawai'i; Sierra Club, Hawai'i Island Group; Kelsey Amos; Christopher Baker; Danielle West; Amy Perruso; Antoinette Freitas; Bianca Isaki; Jerard Jardin; Sam Jacobs; Wendy Volkmann; Michael Gast; Erika Leaf; Ariana Thompson-Lastad; Sam Warren; Sydney Ji; Aurora Cole; Jonathan & Jamaica Osorio; Elisabeth Mehana Makainai; Mailani Makainai; AziaLynne Bird; Helen Jaccard; Dexter Ka'iama*

The No Action Alternative in the EIS elaborates on the impacts (including training impacts) associated with not retaining the State-owned land and associated training facilities, many of which cannot be located elsewhere within PTA due to operational, safety, and environmental constraints. Under the No Action Alternative, all of the State-owned land would be controlled and managed by the State following lease expiration.

Lease Compliance Actions and Return of Land: **Chapter 2** of the EIS includes additional information describing lease compliance actions (e.g., reforestation, removing signs, removing or abandoning structures, and removing weapons and shells) and return of State-owned land not retained that would be triggered via lease expiration under Alternative 2, Alternative 3, and the No Action Alternative. Per the lease, the lease compliance actions may occur after expiration of the lease. The lease includes provisions regarding the technical capabilities and economic costs associated with the lease compliance actions. The Army would conduct the lease compliance actions and return the State-owned land not retained in accordance with the lease or otherwise negotiated with the State. The parameters for lease compliance actions would be defined and determined after completion of the EIS. It is assumed lease compliance actions would occur under various Department of Defense programs. Additionally, it is assumed removal, investigation, and cleanup of hazardous and toxic materials and wastes, including munitions and explosives of concern, within the State-owned land not retained would occur under the Comprehensive Environmental Response, Compensation, and Liability Act.

## **LAND RETENTION ESTATES**

*Army response to comments received from: Temple of Lono; Hawai'i Peace and Justice; Sierra Club, Hawai'i Island Group; Helen Jaccard; Dr. Noe Noe Wong-Wilson; Alexandra Bernstein*

The EIS clarifies that the current lease of State-owned land cannot be renewed or extended under current State laws. If the Army decides to proceed with the Proposed Action, the Army would negotiate with the State regarding one or more new land retention estates (i.e., title, lease, easement, and license) and methods (e.g., purchase, negotiation, donation, exchange, eminent domain) for the selected alternative. Each of the parties, the Army and State, would negotiate based on its needs and obligations as is typical of any negotiation. Because negotiation options cannot be known prior to initiation of negotiation, which cannot formally begin before the conclusion of the EIS process, the potential conditions, duration, land valuation methods, and fees associated with the various land retention estates are outside the scope of the EIS.

Hawai'i County is not the land owner of the State-owned land; therefore, the Army would not negotiate with the county.

The EIS does not consider the potential land retention methods for conducting the various land retention estates because the potential impacts on the State-owned land would be the same regardless of the land retention method.

## Affected Environment and Consequences

### LAND USE

*Army response to comments received from: U.S. Department of the Interior, National Park Service, National Natural Landmarks Program; Department of Hawaiian Home Lands; Department of Health, Hazard Evaluation and Emergency Response Office; Temple of Lono; Maunakea Observatories; Hawai'i Peace and Justice; University of Hawai'i Institute for Astronomy; Sierra Club, Hawai'i Island Group; Native Hawaiian Legal Corporation; Sheena Lopes; Jeffrey Mermel; Jon Sabati; Keith Okamoto; Laurie Jenkins; Jim Albertini; Henrietta Jeremiah; Jerard Jardin; Hanalei Fergerstrom; Joel Nakamoto; Maka'ala O Ka Hana Wai; Mauna Kea Moku Nui 'Aelike/Consensus Building 'Ohana; Native Hawaiian Legal Corporation; Carl Christensen; Michael Linnolt; Aaron Stene; Kelsey Amos; Christopher Baker; Danielle West; Amy Perruso; Antoinette Freitas; Bianca Isaki; Selah Levine; Carl Geise; Wendy Volkmann; Michael Gast; Erika Leaf; Michael Reimer; Ariana Thompson-Lastad; A'ohē 'Oihana; Sam Warren; Sydney Ji; Aurora Cole; James Anthony; Elisabeth Mehana Makainai; Mailani Makainai; AziaLynne Bird; Amanda Dillon; Sofronio Estores; Helen Jaccard; Dr. Noe Noe Wong-Wilson; Dexter Ka'iama; Linnea Heu; Nancy Redfeather*

**Section 3.2**, the Land Use section of the EIS, encompasses recreation (including hunting), encroachment management, vistas, and land tenure. Hunting is the primary recreational use in State-owned land at PTA; which unit(s) are open for hunting depend on military training schedules. Public hunting within PTA is governed by State rules, and the schedule is subject to training schedule compatibility. State management of hunting areas within PTA is outside the scope of this EIS.

Potential impacts on visual resources, including the Mauna Kea National Natural Landmark, are analyzed in **Section 3.2**.

The EIS describes the State-owned land currently leased by the Army based on federal, State of Hawai'i, and County of Hawai'i laws and classifications of land tenure. The EIS presents the current federal and state laws and legal rulings that affirm the State-owned land at PTA was legally transferred to the State. The EIS analyses is based on these existing legal precedents.

The parcel descriptions attached to the lease provide the legal definition of the land, based on land surveys. The lease identifies DLNR as the lessor of the State-owned land. On the eastern boundary of the area defined as Parcel C in the lease, 250 acres appear to be owned by the State of Hawai'i and managed

and administered by DHHL. **Section 3.2** of the EIS provides further information regarding the status of the lease.

Ceded land was either Crown or government land until 1893, when the Hawaiian Kingdom was overthrown. Tenure of ceded land has evolved over time and ownership is currently held by both the State and federal governments. An overview of ceded land tenure in Hawai'i is provided in EIS **Section 3.2**.

The Proposed Action stated in the EIS, "to retain... State-owned land at PTA," does not specify the estate(s) and method(s) of land retention. This is due to several factors, including (1) negotiation options cannot be known prior to negotiations being initiated, which cannot formally begin before the conclusion of the EIS process, (2) the potential conditions associated with the various land retention estates are not known and would be subject to negotiation, and (3) the final negotiation could include multiple land retention estates and methods. Army Regulation 405-10 authorizes various estates for Army retention of non-federal government-owned land including title (full ownership), lease, easement, and license.

The Army strives to comply with lease terms and was not a party to the lawsuit brought by Ching and Kaha'ulelio (referred to as Ching v. DLNR). **Section 3.5** of the EIS summarizes the current conditions and potential impacts related to hazardous materials and wastes on the State-owned land.

In 1964, all lands in the State were classified into four land use districts: urban, rural, agricultural and conservation. The conservation district encompasses lands in the forest and water reserve zones established prior to 1957. The conservation district statute, HRS Section 183C, considers lawful use of lands established prior to October 1, 1964 as nonconforming. The lease for PTA was executed prior to that date and therefore has not been required to conform to the statute. HAR Chapter 13-5 provides for authorization of additional uses as discussed in EIS **Section 3.2**.

## **BIOLOGICAL RESOURCES**

*Army response to comments received from: U.S. Environmental Protection Agency, Region 9 Environmental Review Branch; Maunakea Observatories; Hawai'i Peace and Justice; Sierra Club, Hawai'i Island Group; Hawai'i Island Chamber of Commerce; Mauna Kea Moku Nui 'Aelike/Consensus Building 'Ohana; Native Hawaiian Legal Corporation; Jared Bernard; Jody Brissette; Jon Sabati; Kelsey Amos; Christopher Baker; Danielle West; Amy Perruso; Antoinette Freitas; Bianca Isaki; Shelly Aina; Wendy Volkmann; Michael Gast; Erika Leaf; William Greentree; Cindy Kester; Ariana Thompson-Lastad; Sam Warren; Sydney Ji; Colonel Ann Wright; Aurora Cole; Amanda Dillon; Seanna Pieper-Jordan; Linnea Heu; Nancy Redfeather; Joel Nakamoto*

Federal activities are guided by Endangered Species Act as discussed in EIS **Section 3.3.2**. All U.S. military installations are required to have an *Integrated Natural Resource Management Plan* (INRMP) to provide technical guidance to those responsible for land use planning and decision-making. The INRMP incorporates information and responsibilities outlined in biological opinions issued by the U.S. Fish and Wildlife Service under Section 7 of the Endangered Species Act. Obligations of the federal government

with respect to all trust resources at PTA are spelled out in the INRMP and pertain to the State-owned land until the land is no longer under U.S. military control.

Conservation efforts have been undertaken at PTA for threatened and endangered plant species. Approximately 28 miles and 8,500 acres of ungulate exclusion fencing has been installed to form seven units located in part, or entirely, on State-owned land (**Figure 3-5**). Fencing enclosure areas allow the Army to manage sensitive species more efficiently and effectively. The distribution of native plants and animals within the State-owned land is described in the EIS, and federally- and State-listed species identified in previous surveys provided in **Tables 3-3, 3-4** and **3-5**. While approximately 5,095 acres of State-owned land in PTA was designated as Palila critical habitat in 1977, *Loxioides bailleui* (finch-billed honeycreeper) is generally seen only at elevations well above those of the State-owned land at PTA (**Figure 3-5**). There have been no observations of this species on State-owned land at PTA.

Hunting opportunities are provided to the public in designated areas outside the ungulate exclusion fencing units. Measures to address ungulate control are included in the existing INRMP. The EIS considers the impact of potential changes to access for hunting on the State-owned land related to the alternatives in **Section 3.2**.

#### **ARCHAEOLOGICAL AND HISTORIC RESOURCES**

*Army response to comments received from: U.S. Environmental Protection Agency, Region 9 Environmental Review Branch; Sierra Club, Hawai'i Island Group; Mauna Kea Moku Nui 'Aelike/Consensus Building 'Ohana; Native Hawaiian Legal Corporation; Ariana Thompson-Lastad; Sam Warren; Sydney Ji; Colonel Ann Wright; Charley Ice; Seanna Pieper-Jordan; Sofronio Estores; Jojo Tanimoto; James Head; Nancy Redfeather*

The EIS presents a thorough review of baseline archaeological and historic resource conditions, including summaries of previous archaeological studies conducted within State-owned land and an inventory of identified archaeological and historic architecture properties. The EIS includes this information in narrative and tabular form. The scope of this EIS covers the alternatives of full to minimum retention of the State-owned land only, and addresses only the current baseline conditions for the State-owned land.

The Proposed Action for this EIS is a real estate action. It does not include proposed changes to the ongoing activities conducted at PTA. Potential future actions that are not part of the current Proposed Action would require separate NEPA analysis.

Rigorous avoidance measures for historic properties known to be extant within PTA are defined in two documents: *Programmatic Agreement Among The U.S. Army Garrison, Pōhakuloa Training Area, U.S. Army Garrison, Hawaii, The Hawai'i State Historic Preservation Officer, and the Advisory Council on Historic Preservation Regarding Routine Military Training Actions and Related Activities at United States Army Installations on the Island of Hawai'i, Hawai'i and Integrated Cultural Resources Management Plan for the U.S. Army Garrison*. The EIS summarizes the applicable elements of the following documents, which can be referenced by the public:

[https://home.army.mil/hawaii/application/files/7215/6262/2746/USAG-P ICRMP Hawaii Final Signed.pdf](https://home.army.mil/hawaii/application/files/7215/6262/2746/USAG-P_ICRMP_Hawaii_Final_Signed.pdf); [https://home.army.mil/hawaii/application/files/3916/0210/3455/USAG-P Hawaii Island Training PA Signed 27SEP18 PUBLIC RELEASE VERSION.pdf](https://home.army.mil/hawaii/application/files/3916/0210/3455/USAG-P_Hawaii_Island_Training_PA_Signed_27SEP18_PUBLIC_RELEASE_VERSION.pdf)

The EIS discusses Proposed Action in relationship to relevant historic preservation laws, including the National Historic Preservation Act (NHPA) and Hawai'i Revised Statutes Chapter 6E.

## **CULTURAL RESOURCES**

*Army response to comments received from: County of Hawaii Planning Department; Hawaii County Council, District 9 (North and South Kohala); Temple of Lono; Ola'a First Hawaiian Church; Hawai'i Peace and Justice; Mālama Mākuā; Sierra Club, Hawai'i Island Group; Maka'ala O Ka Hana Wai; Hawai'i Island Chamber of Commerce; Mauna Kea Moku Nui 'Aelike/Consensus Building 'Ohana; Native Hawaiian Legal Corporation; Et Al. Native Tenants; Tara Rojas; Sheena Lopes; Cat Orlans; Thomas Lenchanko; Donna Grabow; Kelsey Amos; Christopher Baker; Danielle West; Amy Perruso; Antoinette Freitas; Bianca Isaki; Jim Albertini; Shelly Aina; Ellen Schomer; Carol McMillan; Wendy Volkmann; Michael Gast; Erika Leaf; Kinion Wahineali'i Carroll; Savory Yarrow; Ellen Wilhite; Colonel Ann Wright; M. Kalani Souza; Aurora Cole; Jonathan & Jamaica Osorio; Sofronio Estores; Helen Jaccard; Hanalei Fergerstrom; Dr. Noe Noe Wong-Wilson; Dexter Ka'iama; Pearl Kaiama; Jim Albertini; Jojo Tanimoto; Kahumu Rasi*

Archaeological surveys and Cultural Impact Assessments (CIAs) are concerned with distinct and different foci. Archaeological studies are primarily concerned with historic properties and tangible heritage, whereas CIAs consider cultural practices and beliefs, which can be associated with a specific location but are also often intangible in nature. Articles IX and XII of the State Constitution, other state laws, and the courts of the state require state government agencies to protect and preserve cultural beliefs, practices, and resources of Native Hawaiians and other ethnic groups. To assist state decision makers in the protection of cultural resources, HRS Chapter 343 and HAR 11-200.1 rules for the environmental impact assessment process require project proponents to assess proposed actions for their potential impacts to cultural properties, practices, and beliefs.

This process was clarified by the Act 50, Session Laws of Hawai'i 2000, which recognizes the importance of protecting Native Hawaiian cultural resources and requires that an EIS include the disclosure of the effects of a proposed action on the cultural practices of the community and state, and the Native Hawaiian community in particular. Specifically, the Environmental Council suggested the CIAs should include information relating to practices and beliefs of a particular cultural or ethnic group or groups. Such information may be obtained through public scoping, community meetings, ethnographic interviews, and oral histories. The EIS highlights the process undertaken to prepare a CIA for the Pōhakuloa area.

The CIA (**Appendix E**) presents a comprehensive collection of information about the state lands, federal lands, and cultural landscape as the geographic extent of study. It fills gaps in data from previous studies by thoroughly identifying place names and cultural resources found in English and Hawaiian language resources. The comprehensive list of data serves as a critical baseline from which cultural resources and

traditional practices were identified. Numerous historic maps previously excluded from past studies are included in the CIA. Appropriate information concerning the related ahupua'a was collected, focused on areas near or adjacent to the project area, and a thorough analysis of the project's potential impacts to cultural resources and traditional practices (including access rights) was conducted. All the comments from the scoping period related to these issues are summarized in the CIA and were responded to within the analysis framework. Summaries of interviews with recognized cultural experts are included in the CIA.

The State and its agencies have an affirmative obligation to preserve and protect the reasonable exercise of customarily and traditionally exercised rights of Hawaiians to the extent feasible. State law further recognizes that the cultural landscapes provide living and valuable cultural resources where Native Hawaiians have and continue to exercise traditional and customary practices, including to hunting, fishing, gathering, and religious practices. In *Ka Pa'akai*, the Hawai'i Supreme Court provided government agencies an analytical framework to ensure the protection and preservation of traditional and customary Native Hawaiian rights while reasonably accommodating competing private development interests. The CIA further describes how this is accomplished.

Any analysis of land ownership is outside the scope of these documents. The EIS provides an overview of land tenure in Hawai'i in **Section 3.2**, but land ownership history is not analyzed.

#### **HAZARDOUS MATERIALS AND WASTES**

*Army response to comments received from: U.S. Environmental Protection Agency, Region 9 Environmental Review Branch; Department of Hawaiian Home Lands; Department of Health, Hazard Evaluation and Emergency Response Office; Temple of Lono; Hawai'i Peace and Justice; Environmental Caucus of the Democratic Party of Hawai'i; Sierra Club, Hawai'i Island Group; Maka'ala O Ka Hana Wai; Mauna Kea Moku Nui 'Aelike/Consensus Building 'Ohana; Native Hawaiian Legal Corporation; Carl Christensen; Alexis Cox; Kelsey Amos; Christopher Baker; Danielle West; Amy Perruso; Antoinette Freitas; Bianca Isaki; Dana Keawe; Wendy Volkmann; Michael Gast; Erika Leaf; Lorrie Beggs; Kalai S. Posiulaj; Kinion Wahineali'i Carroll; Michael Reimer; Ariana Thompson-Lastad; Sam Warren; Sydney Ji; Colonel Ann Wright; Mailani Makainai; AziaLynne Bird; Seanna Pieper-Jordan; Sofronio Estores; Brenda Bailey-White; Dr. Noe Noe Wong-Wilson; Jim Albertini; Michael Jones; Nancy Redfeather*

The Army adheres to federal requirements to address potential spills and releases including the Installation Restoration Program, Underground Storage Tank/Aboveground Storage Tank Inspection Program, and the Spill Prevention Control and Countermeasures/ National Pollution Discharge Elimination System. If spills occur at PTA, the extent of the spill is investigated, characterized, and remediated in compliance with regulatory requirements, thus minimizing potential pollutants.

The Army has been working with and continues to work closely with the National Response Center and the State of Hawai'i Department of Health to identify soil and surface water contamination. The Army will continue this collaborative effort to ensure the protection of human health and the environment.

The Resource Conservation and Recovery Act of 1976 provides guidelines and standards for the disposal of hazardous waste. This act is the federal program for management and control of hazardous wastes from “cradle to grave” and is the basic law for the regulation of hazardous waste management practices. The Department of the Army Pamphlet 200-1, *Environmental Protection and Enhancement* governs the use, transport, and disposal of all hazardous materials and regulated waste by military or civilian personnel and on-post tenants and contractors at all Army facilities. In addition to these procedures, USAG-HI follows its own Installation Hazardous Waste Management Plan.

Guidance and procedures for the remediation of Formerly Used Defense Sites can be found in the Department of Defense Ammunition and Explosives Safety Standards (DoDD 6055.9E, 2019).

UXO: Between 1960 and 1968, up to 100 20-millimeter spotting rounds containing a depleted uranium (DU) alloy were fired from three ranges into specific areas of the impact area. These ranges and the impact area represent a small fraction of PTA’s total area, and the State-owned land only contains a portion of one of the three ranges. The Army completed a Baseline Human Health Risk Assessment Report in 2010 to assess the potential risk posed by DU at PTA. The risk assessment report indicated that there are no likely adverse impacts to current and potential future persons working on or living near PTA.

In 2011, the DU data and analysis were presented to the Nuclear Regulatory Commission (NRC), which issued a license for the DU at PTA. Under this license, the Army follows approved Safety and Environmental Radiation Monitoring plans to monitor potential DU migration by periodically sampling groundwater and surface water. The license requires the Army to comply with NRC regulations and standards for protecting the public and the environment from radiation and is subject to NRC inspections and periodic reviews. These requirements are meant to ensure the DU will not pose a future health risk. The license does not authorize the Army to use DU or decommission the sites. Any cleanup would require additional review and approval by the NRC to ensure that public health and safety would continue to be protected. Monitoring data indicates no measurable migration of DU to nearby surface water. An airborne uranium monitoring program concluded that the DU had not impacted air quality, and the uranium levels in the collected particulate matter samples were within the range of naturally occurring uranium in Hawaiian soils and rock.

The vast majority of munitions and explosives of concern, which consists of unexploded ordnance, discarded military munitions, and munitions constituents, at PTA has been found on training areas, ranges, and firing points that are not open to the public and are being actively used for military training. The EIS fully discusses the extent of munitions and explosives of concern within the State-owned land and the Army’s cleanup procedures and status of cleanup. If unexploded ordnance is discovered anywhere on PTA, the Army’s Explosive Ordnance Disposal staff uses various methods, including explosives, to disarm or destroy the item.

The Army performed a surface cleanup of the Former Bazooka Range to remove over 1,000 pounds of visible munitions and munitions debris and to eliminate the imminent and substantial health and safety

risk. The EIS provides the latest information on the cleanup of the Former Bazooka Range and other training area/range sites on the State-owned land.

## **AIR QUALITY**

*Army response to comments received from: U.S. Environmental Protection Agency, Region 9 Environmental Review Branch; Sierra Club, Hawai'i Island Group; Hawai'i Peace and Justice; Jeffrey Mermel; Sofronio Estores*

The Army used the Davy Crocket Weapons System at PTA from 1962 to 1968. The system used a 20-millimeter spotting round (M101) to show where the weapon system was aimed. The body of the spotting round was made of a DU alloy. The Davy Crocket Weapons System was fired on four ranges at PTA, and one of the four ranges is partially on the State-owned land (i.e., Range 13 on TA 9). Fugitive dust downwind of the ranges was suspected to have higher than average levels of uranium. The Army completed a 1-year airborne uranium monitoring program in 2009 to determine if the decay and vaporization of DU fragments has impacted local air quality. The monitoring program collected 210 air samples from three sites upwind and downwind of PTA to provide a basis of comparison. The monitoring program concluded that the DU had not impacted air quality at PTA or in the surrounding area because the total airborne uranium levels in the collected particulate matter samples were within the range of naturally occurring uranium in Hawaiian soils and rock and were several orders of magnitude below U.S. and international chemical and radiological health guidelines.

Air emission sources at PTA include exhaust from military vehicles, aircraft flight operations, liquefied petroleum gas-fired boilers servicing four buildings, and ten internal combustion engines; dust from vehicle use on gravel and dirt roads and near-ground helicopter operations; and ordnance use and explosives detonation. The installation's potential and actual air emissions were last enumerated in 2010 and are summarized in EIS **Section 3.6**. These emissions have not appreciably changed since 2010 because installation activities have remained largely consistent, and no additional major facilities have been constructed. Air emission sources associated with training and other activities within the State-owned land include exhaust from military vehicles and aircraft flight operations, dust from vehicle use on gravel and dirt roads and near-ground helicopter operations, ordnance use and explosives detonation, and a 45-kilowatt (60 horsepower) internal combustion engine for an emergency generator at Building 601.

The Army follows a Dust and Soils Management and Monitoring Plan to identify, monitor, and minimize fugitive dust emissions from PTA. While the predominate source of fugitive dust emissions at PTA is maneuver activities on unpaved roads and trails, rotor downwash from helicopter activities have been identified as a lesser source. The Army can implement restrictions on helicopters hovering and landing if soil and atmospheric conditions indicate that excessive dust generation would occur.

In accordance with EO 13990, Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis, and the Army's 4 March 2021 memorandum titled Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in Army National Environmental Policy Act Reviews, the

EIS will follow CEQ's August 2016 guidance titled Final Guidance for Federal Departments and Agencies on Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in National Environmental Policy Act Reviews. **Section 3.6** of the EIS addresses direct and indirect greenhouse gas emissions from the Proposed Action alternatives and the impacts of ongoing climate change on the Proposed Action alternatives. Because the Proposed Action is a real estate transaction, a full life-cycle analysis of greenhouse gas emissions from non-scope considerations such as manufacturing and shipping equipment and materiel and troop movements to and from PTA is beyond the scope of the EIS.

## **NOISE**

*Army response to comments received from: Hawai'i Peace and Justice; Sierra Club, Hawai'i Island Group ; Mahina Embers; Debora Letelier; Anna Lindsey-Robles; Arlene Larrua; Jhonele Gambill; Alana Carvalho; Dangelo McIntyre; Lillian Merle; Andrew Cooper; Kaiki Gunderson-Cook; Nikki Kepano; Mark Gordon; Matilda Keith; Jane Taylor; Selah Levine; Carl Geise; Jhernie Evangelista; Carol McMillan; Valerie Poag; Robert Gerard; Peter Yanan; Brittney Hedlund; Charley Ice; Amanda Dillon; Dr. Noe Noe Wong-Wilson; Alexandra Bernstein; Jojo Tanimoto*

The Proposed Action is a real estate action. It does not include construction, modernization, or changes to the ongoing activities conducted within the State-owned land; however, the alternatives include various levels of retention of the State-owned land, which would affect the levels of training and resulting noise. The EIS provides detailed information on the existing ambient noise environmental from activities associated with the State-owned land as well as the potential effects associated with the Proposed Action alternatives. Health and safety concerns associated with noise are analyzed within the **Section 3.16** and aircraft entering and exiting the restricted area R-3103, or transiting to PTA airspace are addressed within **Section 3.13** of the EIS.

PTA complies with all State of Hawai'i noise laws and regulations. The U.S. Army Garrison-Pōhakuloa Public Affairs Office routinely sends out community updates advising community members of training schedules and convoy alerts. This notification is submitted via the PTA website. Additionally, the Army provides newspaper training notifications and routinely participates in community meetings and events where information is shared with and received from the public.

Because the Proposed Action does not include construction, modernization, or changes to ongoing activities conducted within the State-owned land, noise modeling is beyond the scope of the EIS. Consequently, the EIS presents the qualitative effects of the Proposed Action alternatives on noise.

## **GEOLOGY AND SOILS**

*Army response to comments received from: Hawai'i Peace and Justice; Jeff Bond; Alexandra Bernstein; Linda Manabe; Nancy Redfeather*

The Proposed Action is a real estate action (i.e., retention of the State-owned land). The EIS does not include proposed changes to the ongoing activities conducted within the State-owned land. Use of the

area for farming is not considered as part of the Proposed Action and is therefore beyond the scope of this study.

The island of Hawai'i is geologically active, with many volcanic eruptions recorded in historic times. Mauna Loa is an active basaltic volcano southwest of PTA, and has erupted 33 times since its first documented historic eruption in 1843. Mauna Kea last erupted about 3,500 years ago and is considered dormant. Lava from Mauna Loa's last eruption in 1984, from the Northeast Rift Zone, spread lava that extends northeast from the Mauna Loa crater and skirts the southeast boundary of PTA. Five Mauna Loa flows of known age traverse PTA. Flows from Mauna Loa that have entered the PTA boundary last occurred in 1935.

The U.S. Geological Survey recognizes nine Lava Hazard Zones, based on historical records of eruptions and seismic events. Lava Hazard Zones are discussed in EIS **Section 3.8**. The southeastern portion of the property is located in Zone 2; the southwestern portion of the property is located in Zone 3; and the northern portions of the property located on the upslope of Mauna Kea are located in Zone 8. Zone 8 represents areas where only a few percent of the area has been covered by lava during the past 10,000 years, while Zone 2 represents areas adjacent to and downslope of active rift zones with 15 to 25 percent of the area being covered by lava since 1800 and 25 to 75 percent of area being covered by lava in the last 750 years, and Zone 3 is slightly less hazardous because of its greater distance from recently active vents or due to the area's topography, which reduces the inundation risk of the area.

The State-owned land is in an area with a 10 percent probability that an earthquake could cause a ground acceleration of more than 40 to 60 percent of gravity in the next 50 years, with the likely size of the earthquake increasing to the south in the direction of Kilauea and the southern coast. Sometimes large regional earthquakes (greater than magnitude six) are related to a subsequent eruption or to some type of unrest at a nearby volcano if the volcano is poised to erupt and meets two significant conditions: (1) enough "eruptible" magma within the volcanic system, and (2) significant pressure within the magma storage region.

The area's relatively young geologic age, low precipitation, and rapid runoff, results in mostly thin and poorly developed soils inadequate for farming. Much of the land surface is characterized by sparsely vegetated basaltic rock in the early stages of decomposition and soil formation.

The conclusions of an Operational Range Assessment Program assessment of PTA conducted in 2009 found that the migration pathways that munitions constituents of concern resulting from operations would use to leave the range area do not exist at PTA. As a result, contaminants are generally confined to the range areas and within the impact area at PTA.

The EIS includes a description of the geologic conditions within the State-owned land and analyzes the potential impacts from the Proposed Action. More information is provided in EIS **Section 3.8**.

## **SOCIOECONOMICS**

*Army response to comments received from: County of Hawaii Planning Department; Girl Scouts of Hawai'i; Associated Universities Inc.; Maunakea Observatories; Hawai'i Peace and Justice; Pacific Resource Partnership; Kona-Kohala Chamber of Commerce; University of Hawai'i Institute for Astronomy; Sierra Club, Hawai'i Island Group; Hawai'i Island Chamber of Commerce; Hawaii County Council, District 9 (North and South Kohala); Jody Brissette; Marco Jablonowitz; Aaron Stene; Marcia Goldman-Manker; Blake Doll; Dale Ross; Keith Marrack; Mark Gordon; John Makoff; Amanda Dillon; Sofronio Estores; Helen Jaccard*

The Army strives to be a good neighbor and adheres to federal, state, and local laws and Army regulations and policies regarding the protection of the human and natural environment.

The Army has not calculated the potential costs associated with the lease compliance actions and investigation, removal, and cleanup of hazardous and toxic materials and wastes within the State-owned land. The parameters for lease compliance actions are subject to the terms of the 1964 lease and negotiation with the State, which cannot be done until the EIS is complete and an alternative has been selected.

If the Army selects to proceed with the Proposed Action, the Army would consider the most appropriate land retention estate(s) method(s) for the selected alternative. Because negotiation options cannot be known prior to negotiations being initiated, which cannot formally start before the conclusion of the EIS process, potential land valuation methods and fees associated with the various land retention estates and methods cannot be evaluated in the EIS.

The Proposed Action is a real estate action. It does not include construction, modernization, or changes in ongoing activities. The EIS provides discussion of the economic benefits PTA has on the local economy, as well as potential socioeconomic impacts of the Proposed Action.

## **WATER RESOURCES**

*Army response to comments received from: Hawaii Department of Land and Natural Resources; Hawai'i Peace and Justice; Sierra Club, Hawai'i Island Group; Maka'ala O Ka Hana Wai; Mauna Kea Moku Nui 'Aelike/Consensus Building 'Ohana; Native Hawaiian Legal Corporation; Jeffrey Mermel; Jim Albertini; Jerard Jardin; Carol McMillan; Kinion Wahineali'i Carroll; Brittney Hedlund; Charley Ice; Seanna Pieper-Jordan; Linnea Heu*

PTA lies within the Northwest Mauna Loa and the West Mauna Kea watersheds of the island of Hawai'i, which drain to the northern Kona and southern Kohala coasts. The highly permeable rock and soil deposits generally absorb precipitation without forming stream channels or gulches, which is why intermittent streams typically only appear during periods of steady rain. The lack of surface water and groundwater greatly reduces the probability of contaminant migration within the State-owned land.

The closest drinking water well is 4,260 to 4,280 feet deep at the Waikiʻi Ranch (14 miles from PTA’s main gate). The state monitors all drinking water sources for water quality. Since August 1989, the State of Hawaiʻi Department of Health has issued “Groundwater Contamination Maps” for Hawaiʻi. According to these maps, most of the well locations where contamination is detected on the island of Hawaiʻi are located along the eastern coast, and groundwater quality generally diminished towards the coasts due to increased saltwater intrusion. Detected contamination levels are below federal and state drinking water standards and do not pose a significant risk to humans. Groundwater quality beneath the State-owned land is likely of higher quality due to its distance inland from the coast. The EIS provides additional information available on groundwater resources on the State-owned land.

Two small-diameter holes were drilled for testing within the U.S. Government-owned land at PTA and were not designed to develop potable water. A non-aerially extensive perched aquifer was encountered in the test hole drilled near the main base at a depth of between 700 to 1,181 feet below ground surface. A more aerially extensive perched aquifer is believed to be present at approximately 1,800 feet below ground surface below the State-owned land. PTA is a remote facility, there are currently no plans to develop potable water within the State-owned land. Potable water is currently trucked to PTA from 40 miles away.

The State-owned land is within Flood Hazard Zone X, which corresponded to an area determined to be outside the 0.2 percent annual chance floodplain. There are no perennial streams, rivers, wetlands, marine waters, or coastal resources within or with a relationship to State-owned land. Lake Waiau, located near the summit of Mauna Kea approximately 4.5 miles from PTA, is the nearest known permanent surface water body, and is not used by PTA.

Additional information regarding groundwater resources is provided in EIS **Section 3.9**.

#### **TRANSPORTATION AND TRAFFIC**

*Army response to comments received from: Hawaiʻi Department of Transportation Statewide Transportation Planning Office; Sierra Club, Hawaiʻi Island Group; Hawaiʻi Peace and Justice; Shelly Aina; Jojo Tanimoto*

The Proposed Action is a real estate transaction (retention of the State-owned land) and does not include construction, modernization, changes to ongoing activities conducted within the retained State-owned land, or changes to use of the local airports, roadways, and harbors. The Proposed Action alternatives vary from full retention to no retention of the State-owned land, which would result in the same or less use of existing PTA and regional transportation networks.

U.S. Army Garrison-Hawaii publishes media releases to local newspapers, radio stations, and online (via the PTA website) to provide advanced notice of upcoming convoys and training activities occurring at PTA. The PTA Public Affairs Office also provides routine community updates and FLASH alerts regarding trainings and convoys via email (upon request). The Army acknowledges the jurisdiction and responsibilities of the State of Hawaiʻi, Department of Transportation Airports, Highways, and Harbors

Divisions. Additional information, including a summary of existing PTA and regional transportation networks and traffic conditions and analysis of potential impacts from the Proposed Action alternatives, is provided in the EIS. In addition, effects from Proposed Action activities near public roadways on human health and safety are summarized in the EIS. **Section 2.3** of the EIS presents the land retention estates available to the Army.

## **AIRSPACE**

*Army response to comments received from: Richard Schulherr; Megan Ploski; Sharon Torbert; Alexandra Bernstein; William Greentree; Kathleen Slaughter*

PTA aircraft comply with all Federal Aviation Administration guidelines and requirements to ensure safe airspace usage and minimize airspace usage conflicts. All aircraft pilots and crew visiting PTA receive a briefing from the Bradshaw Army Airfield Air Traffic and Airspace Chief designed to minimize noise impacts and disruption to local communities. The briefing specifies the flight route to PTA devised specifically to avoid populated areas as much as possible. Additionally, aircraft are directed to fly at 2,000 feet above ground level during transition to PTA airspace, unless low cloud cover necessitates flying lower for safety reasons. Current aircraft and airspace activities were previously analyzed in separate NEPA documents. Bradshaw Army Airfield is located on U.S. Government-owned land.

The Proposed Action is a real estate action (retention of State-owned land) that would enable continuation of ongoing activities within the State-owned land. It does not include changes in ongoing activities conducted within the State-owned land. Aircraft and airspace activities not associated with the State-owned land are outside the scope of the EIS.

## **UTILITIES**

*Army response to comments received from: Department of Water Supply - County of Hawaii; Hawaii Department of Land and Natural Resources; Shelly Aina; Elisabeth Mehana Makainai; Mailani Makainai; AziaLynne Bird; Dexter Ka'iama*

The Proposed Action is a real estate action (i.e., retention of the State-owned land). It does not include construction, modernization, or changes in ongoing activities within the retained State-owned land. Solid waste generated on PTA (including the State-owned land) is managed on the Cantonment (U.S. Government-owned land) and no new solid waste actions would occur under the Proposed Action. Solid waste impacts would be the same under Alternative 1, but less solid waste would be generated under Alternatives 2 and 3 and the No Action Alternative due to Army not retaining State-owned land and therefore not conducting ongoing activities in those areas of the State-owned land or associated activities on U.S. Government-owned land.

Septic tank and portable latrine waste from training events is and would continue to be hauled to county wastewater disposal facilities by commercial haulers. Large capacity cesspools formerly used within the U.S. Government-owned land have been cleaned, backfilled, and abandoned as part of a recent sewer

system upgrade. The Army expects to be in full compliance with Act 125 by the 2050 deadline. The cesspools are not discussed in the EIS because they are not on the State-owned land or impacted by activities on the State-owned land. Wastewater disposal facilities and quantities would remain the same under Alternatives 1 and 2 (due to retention of all or the vast majority of the State-owned land) and decrease under Alternative 3 and the No Action Alternative (due to loss of all or a substantial portion of the State-owned land).

## **HUMAN HEALTH AND SAFETY**

*Army response to comments received from: U.S. Environmental Protection Agency, Region 9 Environmental Review Branch; Temple of Lono; Maunakea Observatories; Sierra Club, Hawai'i Island Group; Mariana Monasi; Jim Albertini; Nancy Martin; Kimi Abbott-Jackson; Aurora Cole; Elisabeth Mehana Makainai; Sofronio Estores; Dexter Ka'iama; Alexandra Bernstein; Jojo Tanimoto*

Ongoing activities within the State-owned land were previously analyzed in separate NEPA documents. Activities not associated with the State-owned land are outside the scope of the EIS.

The EIS characterizes the health and safety conditions of military personnel and the surrounding communities from ongoing activities on the State-owned land. Characterization of the existing health and safety conditions includes consideration of relevant PTA safety reports and health studies, as well as additional information such as how the Army works with the Mauna Kea Observatories and provides essential police and emergency medical services to PTA and surrounding communities. **Section 3.16** of the EIS discusses the potential health and safety effects on military personnel and the community under each of the Proposed Action alternatives.

Between 1960 and 1968, 20-millimeter spotting rounds containing a depleted uranium (DU) alloy were fired from three ranges into specific areas of the impact area. These ranges and the impact area represent a small fraction of PTA's total area, and the State-owned land only contains a portion of one of the three ranges. A Baseline Human Health Risk Assessment Report completed by the Army in 2010 indicated there are no likely adverse impacts to persons working on or living near PTA as a result of DU at PTA. In 2011, the data and analysis were presented to the Nuclear Regulatory Commission, which issued a license for DU at PTA. Under this license, the Army follows approved Safety and Environmental Radiation Monitoring plans to monitor potential DU. **Sections 3.5** and **3.6** in the EIS present information on DU and monitoring results, which conclude that the uranium levels in the collected particulate matter samples are within the range of naturally occurring uranium in Hawaiian soils and rock.

Debris from artillery training is contained within PTA training areas, ranges, firing points, and impact areas that are not open to the public and are closely monitored by the Army. The Army monitors the potential for offsite migration of contamination under the Operational Range Assessment Program and has determined groundwater and surface waters are unlikely to be contaminated by explosive residues. Information regarding contaminants, groundwater, and surface waters at PTA is included in **Section 3.5**

and **Section 3.9** of the EIS. All health and safety concerns, including the potential for lead contamination in water and soils, is summarized in the EIS.

## EIS Findings

### CUMULATIVE

*Army response to comments received from: County of Hawaii Planning Department; Hawai'i Peace and Justice; Sierra Club, Hawai'i Island Group; Mauna Kea Moku Nui 'Aelike/Consensus Building 'Ohana; Native Hawaiian Legal Corporation; Sasha Davis; Jonathan & Jamaica Osorio; Brenda Bailey-White*

NEPA analyses must assess cumulative effects, which are the impact on the environment resulting from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions. The EIS considers the effects of past activities at PTA in combination with the effects of the action alternatives, and a set of reasonably foreseeable actions proposed by federal, non-federal agencies, and private parties on the island of Hawaii. (See full discussion in the EIS **Chapter 4**.)

The cumulative impact analysis considers actions where impacts of the proposed action would have a connection, in space or time, with impacts from other actions and consequently have the potential to contribute to cumulative impacts. This connection includes one between individuals or groups who may incur impacts related to events of a historical nature (e.g., the connection between Native Hawaiians and the maintenance of customary practices). The timeframe for actions addressed in the cumulative analysis is 10 years, which is approximate to the timeframe anticipated for implementation of any of the action alternatives.

Impacts of past activities at PTA are addressed for each resource, including hazardous and toxic materials and waste. Information in **Section 3.5** draws from numerous sources including Environmental Condition of Property Reports, which the Army undertakes to investigate the potential for environmental contamination of a property for hazardous substances, petroleum products, or other environmental concerns. The most recent ECOP investigation at PTA was conducted in 2017 in order to protect the health of those who formerly, currently, or will potentially in the future occupy the property.

## Plans and Policies

*Army response to comments received from: Department of Hawaiian Home Lands; Environmental Caucus of the Democratic Party of Hawai'i; Carl Christensen; William W. Milks; Charles Ota*

**Chapter 5** of the EIS provides decision makers with an overview of the Proposed Action's conformance with relevant federal, State, and county land use plans, policies and regulations.

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# **Responses to Draft EIS Comments**



## Appendix D

# RESPONSES TO DRAFT EIS COMMENTS

This appendix contains all public and government agency comments submitted during preparation of this EIS, and responses to the comments. Section 1.6 of the EIS summarizes the public input process for the EIS. The 60-day public comment period for the Draft EIS began on April 8, 2022 and ended June 7, 2022. Oral and written comments were received. Following the guidance in the NEPA and HEPA regulations for EIS public input, the EIS preparers reviewed all submissions and identified substantive comments. Responses have been prepared for the substantive comments, and where substantive comments were used to refine text in the EIS is generally noted in the responses.

Commenters are directed to **General Response 1** for comments not considered to be substantive, which acknowledges that the comment was received and reviewed.

### **General Response 1**

Thank you for providing input to the ATR PTA Draft EIS. The Draft EIS was prepared to analyze the potential environmental impacts of the proposed action and alternatives presented, based on public comments during the scoping process. In determining whether a comment on the Draft EIS is substantive, the EIS preparer “consider[ed] the validity, significance and relevance of the comment to the scope, analysis or process of the EIS (HAR Section 11-200.2-26[a]).” For the Draft EIS, comments considered substantive and provided with specific responses are those that pertain to the proposed action, submitted alternatives, information, and analyses and the summary thereof; present new, reasonable, alternatives or changes to an alternative; provide new information relevant to the analysis; question the accuracy of specific information and provide a rationale for questioning accuracy; or question the methodology and/or assumptions used in the analysis and provides support with specific reasons to question the methodology. Statements not considered to be substantive do not pertain to the proposed action or alternatives; pertain to locations or activities at PTA, but outside of State-owned Land; pertain to impacts associated with activities at PTA, but outside of State-owned Land and not associated with the proposed land retention action; comment about general military, policy, actions, or impacts; comment on landownership issues outside the context of State and federal laws; recommend use of land that does not support the purpose and need; or that provide broad, open-ended questions.

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
James Kwon	U.S. Fish and Wildlife Service	<p>Dear PTA Project Team: The U.S. Fish and Wildlife Service (Service) received your notification of the opportunity for agency comment on March 28, 2022, for review of the U.S. Army's (Army) Draft Environmental Impact Statement (DEIS) for Army Training Land Retention (ATLR) at Pohakuloa Training Area (PTA), Hawaii Island, Hawaii. The Army proposes to retain up to approximately 23,000 acres of State-owned land at PTA in support of continued military training. The Service offers the following comments to assist you in your planning process so that impacts to trust resources can be addressed. Our comments are provided under the authorities of the Endangered Species Act of 1973 (ESA), as amended (16 U.S.C 1531 et seq.). Based on review of the documents provided, ATLR PTA DEIS Volumes I and II, and information in our files, we offer the following comments for your consideration. The proposed action is a real estate action that would enable the continuation of ongoing activities (military training; facility, utility, and infrastructure maintenance and repair activities; resource management actions; and associated activities such as emergency services) on State-owned land. Alternatively, no new activities (e.g., military construction, operations and maintenance, training) are proposed. Impacts of ongoing activities to threatened and endangered species and designated critical habitat are addressed by existing consultations in accordance with section 7 of the ESA (Enclosure).</p>	<p>Thank you for noting that existing consultation, in accordance with section 7 of the ESA, covers ongoing activities at PTA.</p>
James Kwon	U.S. Fish and Wildlife Service	<p>Enclosure – List of Recent ESA Section 7 Consultations at PTA USFWS. 2003. Biological Opinion of the U.S. Fish and Wildlife Service for Routine Military Training and Transformation of the 2nd Brigade 25th Infantry Division (Light)(12200- 2003-F-0002). . 2007. Informal Section 7 Consultation on the Disposal of Two High Explosive Rounds at Pohakuloa Training Area (12200-2007-I-0088). . 2008. Reinitiation of Formal Section 7 Consultation for Additional Species and New Training Actions at Pohakuloa Training Area, Hawaii (12200-2008-F-0278). . 2013. Informal Consultation and Formal Consultation with a Biological Opinion for the Construction, Maintenance, and Operation of an Infantry Platoon Battle Area and Installation-wide Impacts of Military Training on Hawaiian Geese (<i>Branta sandvicensis</i>) at Pohakuloa Training Area, Hawaii (01EPIF00-2012-F-0241). . 2013. Informal Consultation for Urban Close Air Support, Pohakuloa Training Area, U.S. Army, Hawaii (01EPIF00-2013-I-0364). . 2013. Informal Consultation for Four New Landing Zones, Pohakuloa Training Area, U.S. Army, Hawaii (01EPIF00-2013-I-0363). . 2014. Informal Consultation for Exploratory Well Hole No. 2 in the Keamuku Maneuver Area, Hawaii (01EPIF00-2014-I-0083). . 2017. Biological Opinion for Installation of Sewer Line Through Pohakuloa Training Area Interpretive Garden (01EPIF00-2017-F-0306). . 2020. Informal consultation for Predator Control at Band-rumped storm petrel colony during the breeding season, Pohakuloa Training Area, Hawaii (01EPIF00-2020-I-0286).</p>	<p>We appreciate confirmation of the existing Army consultation for activities at PTA. Those that pertain to species and/or activities on the 22,750 acres of State-owned land proposed for retention are the focus of this EIS.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Jean Prijatel	U.S. Environmental Protection Agency	<p>The DEIS emphasizes that the Proposed Action is a real estate action that would enable continuation of ongoing activities on the retained State-owned land; however, the DEIS does not evaluate or specify how impacts would differ among the potential land retention estates (title, lease, easement, and license). The decision on the type of land retention estate to be used is deferred to the period after the Record of Decision is signed when the Army negotiates with the State regarding this decision. The impact assessment is based on land retention via title (ownership through fee simple title) only, reasoning that this option would have the most impacts because it would not include potential conditions associated with the other land retention estates.</p>	<p>Section 2.3 revised to note that license is not analyzed as a land retention estate because it is for minimal permission to occupy real property for a short duration. It would not allow for predictable long-term use by the Army; would not enable future facility and infrastructure modernization; and would not necessarily allow exclusion of other users from some facilities, utilities, and infrastructure. Consequently, it does not meet the following elements of the purpose and need statements: (1) provide a long-term interest, (2) allow for future facility and infrastructure modernization, and (3) provide austere, real-world training environment.</p> <p>Section 2.3 revised to clarify there would be no difference in ongoing activities on the State-owned land retained under the land retention estates selected for analysis (i.e., fee simple title, lease, easement). The only difference is that under lease and easement the Army would adhere to lease/easement conditions, assumed Army obligations in the Court Ordered Management Plan, and applicable State processes/administrative requirements. Because ongoing activities, lease/easement conditions, assumed Army obligations in the Court Ordered Management Plan, and applicable State processes/administrative requirements would be the same under lease and easement, the impacts for lease and easement would be the same; therefore, the EIS only analyzes fee simple title and lease.</p>
Jean Prijatel	U.S. Environmental Protection Agency	<p>The impact assessment requirement under the National Environmental Policy Act is meant to inform decision-makers of impacts prior to decision-making. The DEIS evaluates the question of how much land would be retained, but not how the land would be retained. Both questions will be the subject of decision-making; therefore, we recommend both questions be considered in the impact assessment, particularly because it is not clear whether the post-ROD negotiation and decision-making process would include the opportunity to compare impacts or allow for public involvement. We recommend the final EIS include discussions for those resources where important impact differences exist among land retention methods. We suggest this occur for environmental justice, and for impacts from munitions and explosives of concern (MEC), which includes unexploded ordinance, discarded military munitions, and munitions constituents, but other resource areas may also call for such evaluation. Please see our attached detailed comments for additional discussion of our suggestions on this and other topics, including cultural resources and climate change effects.</p>	<p>Selection of the land retention estate(s) and method(s), and any associated State terms, would occur after completion of the Record of Decision and would not be subject to public involvement. The Army anticipates the EIS and ROD to cover the range of impacts that would occur under any selected land retention estate and method, and any associated State terms would only decrease adverse impacts or increase beneficial impacts.</p> <p>Section 2.3 revised to clarify there would be no difference in ongoing activities on the State-owned land retained under the land retention estates selected for analysis (i.e., fee simple title, lease, easement). The only difference is that under lease and easement the Army would adhere to lease/easement conditions, assumed Army obligations in the Court Ordered Management Plan, and applicable State processes/administrative requirements. Because ongoing activities, lease/easement conditions, assumed Army obligations in the Court Ordered Management Plan, and applicable State processes/administrative requirements would be the same under lease and easement, the impacts for lease and easement would be the same; therefore, the EIS only analyzes fee simple title and lease.</p>
Jean Prijatel	U.S. Environmental Protection Agency	<p>Impacts from Land Retention Methods We note that the DEIS is a joint federal and state impact assessment and the Hawaii EIS Preparation Notice in 2020 indicated that the DEIS would only evaluate title (full ownership), because that land retention method would result in the greatest impacts. Our scoping comments (October 8, 2020) suggested that alternatives could be created to compare impacts of the different possible retention methods; however, the DEIS states that the appropriate land retention estate and method would be determined after the EIS process during negotiations with the State of Hawaii. It is not clear whether any impact assessment would be part of the post-EIS negotiations and decision-making, nor whether the public would be invited to comment.</p>	<p>Selection of the land retention estate(s) and method(s), and any associated State terms, would occur after completion of the Record of Decision and would not be subject to public involvement. The Army anticipates the EIS and ROD to cover the range of impacts that would occur under any selected land retention estate and method, and any associated State terms would only decrease adverse impacts or increase beneficial impacts.</p> <p>Section 2.3 revised to clarify there would be no difference in ongoing activities on the State-owned land retained under the land retention estates selected for analysis (i.e., fee simple title, lease, easement). The only difference is that under lease and easement the Army would adhere to lease/easement conditions, assumed Army obligations in the Court Ordered Management Plan, and applicable State processes/administrative requirements. Because ongoing activities, lease/easement conditions, assumed Army obligations in the Court Ordered Management Plan, and applicable State processes/administrative requirements would be the same under lease and easement, the impacts for lease and easement would be the same; therefore, the EIS only analyzes fee simple title and lease.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Jean Prijatel	U.S. Environmental Protection Agency	There are important differences in potential impacts from different land retention methods for at least two impact areas: environmental justice and MEC (munitions and explosives of concern, which includes unexploded ordinance, discarded military munitions, and munitions constituents). We recommend these impacts be disclosed and compared in the FEIS, even if not evaluated as full NEPA alternatives. Our concerns and recommendations are discussed below.	Section 2.3 revised to clarify there would be no difference in ongoing activities on the State-owned land retained under the land retention estates selected for analysis (i.e., fee simple title, lease, easement). The only difference is that under lease and easement the Army would adhere to lease/easement conditions, assumed Army obligations in the Court Ordered Management Plan, and applicable State processes/administrative requirements. Because ongoing activities, lease/easement conditions, assumed Army obligations in the Court Ordered Management Plan, and applicable State processes/administrative requirements would be the same under lease and easement, the impacts for lease and easement would be the same; therefore, the EIS only analyzes fee simple title and lease.
Jean Prijatel	U.S. Environmental Protection Agency	Environmental Justice We appreciate the discussion in the DEIS regarding the history of land tenure, documented in the Land Use section. There are continuing effects from this history that weigh on members of the Native Hawaiian community, expressed through comments during scoping, that are not captured in the EIS; these remarks were reiterated during public meetings for the DEIS. 1 These comments reference cultural attachment to the land, distress that their native lands were wrongly taken, and a general sense of historical inequity. The comments specifically describe the \$1.00 fee paid by the Army in 1964 for the 65-year lease as an example of inequity.	EIS revised to better characterize, and mitigate as available, the continued effects on Native Hawaiians in the broader context of historic inequities, cultural land values and access to traditionally important or sacred sites.  EIS revised to clarify the actions PTA has been taking to strength its relationships with the Native Hawaiian community.  NEPA and other environmental planning documents and existing management measures can be found in Appendix E.
Jean Prijatel	U.S. Environmental Protection Agency	While the post-EIS negotiations could offer the opportunity to remedy historical injustices, without a clear documentation of differing impacts among land retention options in the EIS, some impacts may not be fully considered. ?	Section 2.3 revised to note that license is not analyzed as a land retention estate because it is for minimal permission to occupy real property for a short duration. It would not allow for predictable long-term use by the Army; would not enable future facility and infrastructure modernization; and would not necessarily allow exclusion of other users from some facilities, utilities, and infrastructure. Consequently, it does not meet the following elements of the purpose and need statements: (1) provide a long-term interest, (2) allow for future facility and infrastructure modernization, and (3) provide austere, real-world training environment.  Section 2.3 revised to clarify there would be no difference in ongoing activities on the State-owned land retained under the land retention estates selected for analysis (i.e., fee simple title, lease, easement). The only difference is that under lease and easement the Army would adhere to lease/easement conditions, assumed Army obligations in the Court Ordered Management Plan, and applicable State processes/administrative requirements. Because ongoing activities, lease/easement conditions, assumed Army obligations in the Court Ordered Management Plan, and applicable State processes/administrative requirements would be the same under lease and easement, the impacts for lease and easement would be the same; therefore, the EIS only analyzes fee simple title and lease.  EIS revised to better characterize the continued effects in the broader context of historic inequities, cultural land values, and access to traditionally important sacred sites.
Jean Prijatel	U.S. Environmental Protection Agency	Recent Executive Orders direct the entire Federal Government to advance equity and racial justice for underserved communities including Native Hawaiian/Pacific Islander communities. Executive Order 13985: Advancing Racial Equity and Support for Underserved Communities Through the Federal Government (January 20, 2021) directs federal agencies to evaluate whether their policies produce racially inequitable results when implemented, and to make the necessary changes to ensure underserved communities are properly supported. Executive Order 14031: Advancing Equity, Justice, and Opportunity for Asian Americans, Native Hawaiians, and Pacific Islanders (May 28, 2021) seeks to eliminate barriers to equity and justice for these populations. We also note that the Department of Defense's Equity Action Plan, pursuant to EO 13985, includes a strategy "to advance equity and rectify past harms" resulting from environmental and other impacts from defense activities on ancestral lands. 2 These directives and DoD's Equity Action Plan should be considered in the context of the project to help guide decision-making.	Thank you for your comment. Please see Section 3.11 of the EIS for information on Environmental Justice.

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Jean Prijatel	U.S. Environmental Protection Agency	Additionally, the guidance document Promising Practices for EJ Methodologies in NEPA Reviews 3 may be helpful to consult when determining how non-chemical stressors (e.g., chronic stress related to environmental or socio-economic impacts) amplify impacts. "The cumulative ecological, aesthetic, historic (emphasis added), cultural, economic, social, or health effects of a proposed action can arise from and also include non-chemical stressors" (Promising Practices, p. 32).	<p>Section 2.3 revised to note that license is not analyzed as a land retention estate because it is for minimal permission to occupy real property for a short duration. It would not allow for predictable long-term use by the Army; would not enable future facility and infrastructure modernization; and would not necessarily allow exclusion of other users from some facilities, utilities, and infrastructure. Consequently, it does not meet the following elements of the purpose and need statements: (1) provide a long-term interest, (2) allow for future facility and infrastructure modernization, and (3) provide austere, real-world training environment.</p> <p>Section 2.3 revised to clarify there would be no difference in ongoing activities on the State-owned land retained under the land retention estates selected for analysis (i.e., fee simple title, lease, easement). The only difference is that under lease and easement the Army would adhere to lease/easement conditions, assumed Army obligations in the Court Ordered Management Plan, and applicable State processes/administrative requirements. Because ongoing activities, lease/easement conditions, assumed Army obligations in the Court Ordered Management Plan, and applicable State processes/administrative requirements would be the same under lease and easement, the impacts for lease and easement would be the same; therefore, the EIS only analyzes fee simple title and lease.</p> <p>EIS revised to better characterize the continued effects in the broader context of historic inequities, cultural land values, and access to traditionally important sacred sites.</p>
Jean Prijatel	U.S. Environmental Protection Agency	Recommendations: In the FEIS, consider how the permanent loss of State land through fee simple retention differs from retention through non-permanent mechanisms such as leases, etc. and discuss impacts related to these land retention mechanisms. Consider how these mechanisms could be received by the public, including communities with environmental justice concerns, in the unique historic context of the affected environment.	<p>Section 2.3 revised to note that license is not analyzed as a land retention estate because it is for minimal permission to occupy real property for a short duration. It would not allow for predictable long-term use by the Army; would not enable future facility and infrastructure modernization; and would not necessarily allow exclusion of other users from some facilities, utilities, and infrastructure. Consequently, it does not meet the following elements of the purpose and need statements: (1) provide a long-term interest, (2) allow for future facility and infrastructure modernization, and (3) provide austere, real-world training environment.</p> <p>Section 2.3 revised to clarify there would be no difference in ongoing activities on the State-owned land retained under the land retention estates selected for analysis (i.e., fee simple title, lease, easement). The only difference is that under lease and easement the Army would adhere to lease/easement conditions, assumed Army obligations in the Court Ordered Management Plan, and applicable State processes/administrative requirements. Because ongoing activities, lease/easement conditions, assumed Army obligations in the Court Ordered Management Plan, and applicable State processes/administrative requirements would be the same under lease and easement, the impacts for lease and easement would be the same; therefore, the EIS only analyzes fee simple title and lease.</p> <p>EIS revised to better characterize the continued effects in the broader context of historic inequities, cultural land values, and access to traditionally important sacred sites.</p>
Jean Prijatel	U.S. Environmental Protection Agency	We recommend that conclusions regarding environmental justice impacts attempt to reflect the mental and emotional health impacts and the larger cumulative sense of loss and injustice, and not only the impacts to specific resources (e.g., transportation, recreation/hunting, or to cultural resource access). After reviewing comments on the DEIS and identifying these additional military land use impacts on environmental justice, identify mitigation measures in the FEIS. Examples could be establishing regular communication channels to strengthen relationships with the Native Hawaiian community, and in consultation, exploring other State-owned military lands that may be underutilized and could be repurposed for community use.	<p>EIS revised to better characterize, and mitigate as available, the continued effects on Native Hawaiians in the broader context of historic inequities, cultural land values and access to traditionally important or sacred sites.</p> <p>EIS revised to clarify the actions PTA has been taking to strengthen it's relationships with the Native Hawaiian community.</p> <p>The EIS has been revised to clarify and distinguish ongoing impacts and management measures (due to continuation of ongoing activities) and potential new impacts and mitigation measures (due to administrative action of continuing or ending ongoing activities and implementing connected actions).</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Jean Prijatel	U.S. Environmental Protection Agency	<p>Munitions and Explosives of Concern It appears that lease conditions could offer some resource protections regarding MEC that would be absent under fee simple retention. The DEIS does not include a discussion of the differences in management of MEC under fee simple ownership by the Army – pursuant to the Resource Conservation and Recovery Act (RCRA) Military Munitions Rule – and under a lease with the State that could contain conditions to address contamination while the range is still active. While future negotiated lease conditions are not known, some reasonable assumptions can be made for the purposes of the assessment. The DEIS includes such assumptions, for example on page 3-83 it states, "If the State-owned land were to be retained via lease, it is assumed a lease compliance monitoring plan would be implemented by [Department of Land and Natural Resources] to confirm lease compliance, particularly with respect to military munitions and MEC." Statements like these in the DEIS allude to possible differences in environmental impacts from MEC under different land retention methods, but the impacts are not assessed nor presented in a manner that evaluates their comparative merits.</p>	<p>Section 2.3 revised to note that license is not analyzed as a land retention estate because it is for minimal permission to occupy real property for a short duration. It would not allow for predictable long-term use by the Army; would not enable future facility and infrastructure modernization; and would not necessarily allow exclusion of other users from some U.S. Government-owned facilities, utilities, and infrastructure. Consequently, it does not meet the following elements of the purpose and need statements: (1) provide a long-term interest, (2) allow for future facility and infrastructure modernization, and (3) provide austere, real-world training environment.</p> <p>Section 2.3 revised to clarify there would be no difference in ongoing activities on the State-owned land retained under the land retention estates selected for analysis (i.e., fee simple title, lease, easement). The only difference is that under lease and easement the Army would adhere to lease/easement conditions, assumed Army obligations in the Court Ordered Management Plan, and applicable State processes/administrative requirements. Because ongoing activities, lease/easement conditions, assumed Army obligations in the Court Ordered Management Plan, and applicable State processes/administrative requirements would be the same under lease and easement, the impacts for lease and easement would be the same; therefore, the EIS only analyzes fee simple title and lease.</p> <p>Army standards for managing munitions and explosives of concern are the same regardless of the land retention estate. EIS revised where applicable based on assumed lease/easement conditions and applicable State processes/administrative requirements for managing munitions and explosives of concern on the State-owned land retained via lease.</p> <p>Sections 3.2.4 and 3.5.4 revised to state that DLNR has implemented the Court Ordered Management Plan and site visits are occurring. Army has received no corrective actions from the site visits.</p>
Jean Prijatel	U.S. Environmental Protection Agency	<p>Recommendation: Include a table or discussion in the FEIS that presents a comparison of impacts from managing unexploded ordinance, discarded military munitions, and munitions constituents for the different land retention methods. Identify assumptions as applicable.</p>	<p>Army standards for managing munitions and explosives of concern are the same regardless of land retention estate. Section 3.5 revised to identify differences for managing munitions and explosives of concern on retained State-owned land based on assumed State conditions for the different land retention estates.</p>
Jean Prijatel	U.S. Environmental Protection Agency	<p>The DEIS identifies long-term, adverse impacts associated with ongoing training activities (p. 128), 4 but concludes that these impacts would be moderate but less than significant under its current management and mitigations via Army cultural resource programs and the 2018 Programmatic Agreement pursuant to the National Historic Preservation Act. Impacts to traditional and customary practices and cultural access were evaluated for the first time in the DEIS and determined to be long-term, adverse and significant due to current access restrictions (p. 3-63). The DEIS conclusion is "significant but mitigable" with mitigation being consultation with Native Hawaiians and providing access to promote and protect cultural beliefs, practices, and resources. While the cultural resources section does not state whether this mitigation would reduce impacts to less than significant, the environmental justice section of the DEIS concludes that providing access for traditional and customary practice would reduce impacts for cultural resources to less than significant (p. 3-152).</p>	<p>The Environmental Justice Section 3.11 in the EIS has been updated to align with the information in the Cultural Resources Section 3.4.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Jean Prijatel	U.S. Environmental Protection Agency	<p>It is unclear whether this conclusion is supported by the Native Hawaiian community. For example, for Makahiki, a ceremonial practice, the Cultural Impact Assessment reveals that Native Hawaiian practitioners have continuously sought access within the project area, and in recent years, practitioners have been allowed limited day access with escorts to conduct the ceremony (App. E p. 310).</p> <p>Recommendation: Disclose in the FEIS whether the impacted Native Hawaiian community agrees that proposed mitigation is sufficient to conclude impacts to access are less than significant. We recommend continued coordination with Native Hawaiian practitioners to ensure mitigation measures allow for the most authentic practice during access opportunities, and a commitment to such measures in the Record of Decision.</p>	<p>Section 3.4.4.4 of the EIS and Sections 5.0 and 6.0 of the CIA have been revised to reflect additional information provided by interviewees who responded to a second request for input in December, 2022, following the height of the COVID-19 pandemic.</p>
Jean Prijatel	U.S. Environmental Protection Agency	<p>According to the Army Climate Assessment Tool, drought is by far one of the greatest climate change threats to PTA and is predicted to be the greatest threat by 2050 (p. 3-91). The DEIS also states that wildfire risk at PTA is relatively low, despite other statements that "wildfires at PTA are considered frequent and the average yearly wildfire occurrence from 2012 through 2017 was 37 per year" (p. 3-205). The DEIS acknowledges the connection between fires and military activity; however, the climate change analysis does not mention increased wildfire risk, nor its connection with predicted increased drought at PTA.</p>	<p>Section 3.6.4 revised to include PTA-specific wildfire information, which is not in the Army Climate Assessment Tool. Sections 3.6.4 and 3.6.6 revised to note that predicted increased drought has the potential to result in increased wildfires, which would impact local air quality.</p>
Jean Prijatel	U.S. Environmental Protection Agency	<p>The DEIS also states that unlike the criteria pollutants, greenhouse gases (GHGs) are global pollutants that have no impact on local and regional air quality (p. 3-89). While it's true that GHGs are pollutants with global impact, the sentence as written implies GHG emissions are not a local or regional concern, despite indirect air quality impacts from climate change caused by GHGs. We note that the 2018 Intergovernmental Panel on Climate Change Report 5 indicates that regions that experience excessive periods of drought and higher temperatures will have increased frequency of wildfires and more windblown dust from soils. It also states there is robust evidence from models and observations that climate change is worsening ozone pollution.</p>	<p>Section 3.6.3 (Region of Influence) revised to include local impacts from climate change.</p>
Jean Prijatel	U.S. Environmental Protection Agency	<p>The criterion used to assess whether an alternative would result in potential significant impacts on GHG emissions is the "extent or degree to which an alternative would meaningfully (measurably) contribute to the potential impacts of global climate change" (p. 3-92). This is not a reasonable methodology for a cumulative impact such as climate change and does not appear to be consistent with the 2016 CEQ climate change guidance ("CEQ recognizes that the totality of climate change impacts is not attributable to any single action, but are exacerbated by a series of actions").</p>	<p>Section 3.6.5 greenhouse gas emissions significance criteria revised as follows: "The criteria considered to assess whether an alternative would result in potential significant impacts on climate change include the following:</p> <ul style="list-style-type: none"> <li>• Comparison of the extent or degree to which the Proposed Action alternatives would emit greenhouse gases. Although there are no recognized thresholds for when greenhouse gas emissions would be significant, it can be assumed that Proposed Action alternatives with greater greenhouse gas emissions would have a greater contribution to the cumulative impact of ongoing global climate change.</li> <li>• Consideration of impacts on the Proposed Action alternatives from ongoing changes to climate patterns. Such impacts would be significant if future climate patterns impaired or precluded an aspect of a Proposed Action alternative."</li> </ul>
Jean Prijatel	U.S. Environmental Protection Agency	<p>Recommendation: Include a discussion of wildfire risk, and its relation to drought and air quality in the climate change impact analysis in the FEIS .</p>	<p>Section 3.6.4 revised to include PTA-specific wildfire information, which is not in the Army Climate Assessment Tool. Sections 3.6.4 and 3.6.6 revised to note that predicted increased drought has the potential to result in increased wildfires, which would impact local air quality.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Jean Prijatel	U.S. Environmental Protection Agency	Clarify the statement regarding GHGs and how they relate to local air quality impacts to include the indirect impacts to local air quality identified above and in the IPCC Report. We recommend improving the impact assessment and conclusions by discussing GHG emissions relative to State GHG emission reduction targets, consistent with CEQ Guidance, and how current training can reduce emissions going forward.	<p>Section 3.6 revised to include the Army's Climate Strategy, DoD Climate Adaptation Plan, and solar panels at PTA ranges.</p> <p>Section 3.6.2 revised to note the Hawaii greenhouse reduction plan in Hawaii Administrative Rules 11-60.1-201 is not applicable to PTA because it is for sources that emit at least 100,000 tons per year of CO<sub>2</sub>e, whereas PTA only has the potential to emit less than 2,600 tons per year of CO<sub>2</sub>e and its actual emissions are much less.</p> <p>Section 3.6.6 revised to note that predicted increased drought has the potential to result in increased wildfires, which would impact local air quality. Section 3.6.6 revised to clarify PTA would continue to implement existing BMPs to reduce greenhouse gas emissions.</p>
Jean Prijatel	U.S. Environmental Protection Agency	Utilities - Wastewater The DEIS states that portable latrine facilities are permanently sited at the Battle Area Complex (p. 3-195). We understand that State of Hawaii regulations generally prohibit the use of portable toilets in permanent situations (See section 11-62-06(e) of Hawaii Administrative Rules) . 7 Recommendation: Work with the Hawaii Department of Health to confirm approval of the permanent portable latrines and include this information in the FEIS.	Section 3.15.2 updated to include state regulations for portable latrines. Section 3.15.4 revised to include additional information on the portable latrines at the BAX, which are permanent and not permitted. PTA works with Hawaii Department of Health to maintain installation compliance with wastewater system regulations.
Mary Alice Evans	State, DBEDT, Office of Planning and Sustainable Development	The Office of Planning and Sustainable Development (OPSD) has reviewed the transmitted material, and have the following comment to offer: 1. Coastal Zone Management Act (CZMA), Federal Consistency We acknowledge that Section 3.2.2, page 3-6 of the DEIS declares the need for a CZMA federal consistency review. The DEIS states "Section 307 of the federal CZMA requires federal agency activities and development projects affecting any coastal use or resource to be undertaken, in a manner consistent to the maximum extent practicable, with a state's CZM program." It goes on to affirm that the Army has initiated coordination with the State to meet CZM consistency review requirements. We can confirm that the USAG-Hawai'i federal consistency determination for the Army Training Land Retention at Pōhakuloa Training Area on the island of Hawai'i was received on July 23, 2021 and that our office deemed it to be incomplete by written notice dated July 27, 2021, in accordance with 15 CFR § 930.41(a). Our office received no further response or information. Please provide your consistency determination in accordance with Subpart C of 15 CFR 930. The CZMA federal consistency review period can begin upon our receipt of all necessary information.	The Army has submitted its application for federal consistency review in accordance with Subpart C of 15 CFR 930, Federal Consistency with Approved Coastal Zone Management Programs, to the State of Hawaii Office of Planning and Sustainable Development. The office will review and provide its determination that the Proposed Action will be undertaken in a manner consistent to the maximum extent practicable with the enforceable policies of the Hawaii Coastal Zone Management Program.
Mike Carberry	Hawaii State DoD	Concerned with the term - "negligible adverse impacts" who is making use of this term and has these negligible impacts been determined by any regulatory authority that they are indeed negligible? Any increase in impervious surfaces will increase stormwater runoff and increase depositional movement of sediment, nutrients, etc - including movement of trace metals. Where is the wastewater being discharged?	The characterization of existing conditions for water resources is based on information presented in Section 3.9.4.1 and impact terms presented in Section 3.1.4. No regulatory assessment of existing conditions is available, which is normally the case.
Karl Bromwell	Hawaii State DoD	In general, there could be further indetification of the required clean-up effort necessary in the No Action Alternative column. For example under land use the beneficial impact identified under the No Action Alternative would not be realized by human receptors in the long-term 10-15 years.	Table 3-24, Potential Environmental Impacts, has been revised. The table relies on refined text from Section 2.2.4.
Alexa Jacroux	Hawaii State DoD	All maps - Recommend representing Bradshaw Army Airfield and FARP's as a linear or point feature instead of as an area on all maps.	The presentation of Bradshaw Army Airfield and FARPs on the figures is based on the Army's GIS data. No change is necessary.
Alexa Jacroux	Hawaii State DoD	Recommend adding Cooper Air Strip and BAAF to maps	Bradshaw Army Airfield is presented on the figures in the EIS when relevant. Cooper Air Strip is not identified on the maps in the EIS due to operational security concerns, as noted in Section 2.1.1.
Alexa Jacroux	Hawaii State DoD	Figure 3-12 clean up legend	Inconsistent capitalization revised in legend.
Alexa Jacroux	Hawaii State DoD	Figure 3-14 a map with simple, legible labels and a legend would be helpful.	Figure 3-14 has been revised.

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Shawn Naito	Hawaii State DoD	Recommend identifying Ammunition Holding Areas, Ammunition Supply Points, and Explosive Safety Quantity Distance (ESQD) as applicable.	Ammunition supply point and ammunition holding areas are not identified on Figure 2-1 for operational security reasons, as noted in Section 2.1.1. Explosive Safety Quantity-Distance arcs are not identified on Figure 2-1 because they are not facilities. Explosive Safety Quantity-Distance arcs are identified in Figure 3-25.
Shawn Naito	Hawaii State DoD	For Alternatives/Screening criterion, recommend adding a short description for criterion at the top of the table. E.g. Criterion 1: Collective Training; Criterion 3: Long-Term Access; Criterion 4: Long Range/Ind Weapons; Criterion 5: Cost Effectiveness	Map font resolution has been improved.
Andrew Choy	State, DHHL	<p>History of Land Ownership</p> <p>DHHL appreciates that the DEIS references DHHL ownership of TMK (3) 3-8-001:103 &amp; (3) 3-8-001:022 (approx. 250 acres) and as such these parcels are under the jurisdiction of the Hawaiian Homes Commission. The DEIS should mention and acknowledge that the subsequent leasing of these two TMK parcels by the State Board of Land and Natural Resources (BLNR) to the Army without the consent of the Hawaiian Homes Commission was and unauthorized use of Hawaiian Home Lands. Further, the DEIS should note that the re-issuance of a 65-year lease by the BLNR to the US Army cannot move forward until this matter is resolved to the satisfaction of the Hawaiian Homes Commission.</p>	<p>EIS Section 3.2.4.1 describes the land ownership of these two TMKs as "owned by the State and managed and administered by DHHL", which is based on the best information of the U.S. Government.</p> <p>As recommended in DHHL comments, the EIS has been revised to remove the 250 acres of DHHL-administered land from Alternative 1. Consequently, the 250 acres of DHHL-administered land are no longer considered for retention by the Army in any alternative.</p>
Andrew Choy	State, DHHL	In order to resolve the issue, the applicant and approving agency should allocate their own time and resources to conduct a robust and meaningful consultation process with the Hawaiian Homes Commission and its native Hawaiian beneficiaries on proposals to resolve the matter of unauthorized use of Hawaiian Home Lands. DHHL staff time and resources should be prioritized to implement the Hawaiian Homes Commission Act rather than be used to clean-up the historic mistakes of other agencies.	<p>As recommended in DHHL comments, the EIS has been revised to remove the 250 acres of DHHL-administered land from Alternative 1. Consequently, the 250 acres of DHHL-administered land are no longer considered for retention by the Army in any alternative.</p> <p>Consultation with Hawaiian Homes Commission and its native Hawaiian beneficiaries to resolve use of State-owned land is beyond the scope of this EIS.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Andrew Choy	State, DHHL	<p>Hazardous and Toxic Materials and Wastes</p> <p>The EISPN for this project acknowledged the presence of hazardous materials within the project area of PTA including the presence of uranium and other harmful substances. Hazardous materials like uranium may decompose over time into tiny sediment particles. The DEIS references a short-term air monitoring program at PTA during January 2006 and 2007 to determine the impact of fugitive dust from training and activities at PTA. As a neighboring land owner, DHHL is very concerned that the presence of hazardous materials within the project area when decomposed could easily be transmitted to neighboring lands via wind, rain run-off, and other methods. Water table testing and air quality testing should be part of a long-term monitoring program incorporated into PTA activities. Annual reports of air quality monitoring and water table testing should be submitted to the State DOH and DHHL.</p> <p>Relationship to Plans, Policies, and Controls DHHL Appreciates references to its related plans and policies.</p>	<p>Section 3.5.4.11 notes that the migration of munitions constituents at PTA is limited due to limited surface water and groundwater pathways because of low rainfall, lack of perennial streams, and the deep depth to the groundwater aquifer.</p> <p>Section 3.5.4.12 clarified to indicate surveys found no indication of depleted uranium-containing materials on the State-owned land. Section 3.5.6 notes the Army would continue to follow the Nuclear Regulatory Commission-approved Safety and Environmental Radiation Monitoring plans to monitor for potential depleted uranium migration. Conditions of the Nuclear Regulatory Commission-approved Safety and Environmental Radiation Monitoring plans clarified in Section 3.5.4.12.</p> <p>Section 3.6.4 revised to note that activities within the State-owned land have changed some since fugitive dust monitoring was conducted in 2006-2007; however, the type and quantity of activities have not significantly changed so fugitive dust generation is expected to be comparable to the 2006-2007 monitoring event. The fugitive dust monitoring was discontinued in 2007 because a year of monitoring showed the levels to be well below state and federal limits. There are no planned changes to training activities or frequency in the State-owned land.</p> <p>Section 3.6.4 revised with requirements for control of fugitive dust in Hawaii Administrative Rules Section 11-60.1-33. Sections 3.6.4 and 3.6.6 revised to state PTA manages and would continue to manage fugitive dust via 1) erosion control and stabilization techniques (revegetation, erosion control structures, site hardening, dust palliatives) under the Land Rehabilitation and Maintenance component of the Integrated Training Management Program (USAG-HI &amp; USARPAC, 2013), 2) adherence to Unified Facilities Criteria 3-250-09FA, Aggregate Surfaced Roads and Airfields Areas, which has dust control requirements for aggregate surfaced roads and airstrips of airfields at Army installations, and 3) best management practices such as maintenance of roads and training trails, maintenance of vegetative cover, periodic application of water to control dust, and modifying training during high risk conditions. Integrated Training Management Program Land Rehabilitation and Maintenance project best management practices are assessed annually during Range and Training Land Assessment reviews (U.S. Army Hawaii Range Division, 2022).</p> <p>Under the Proposed Action, the Army would continue to manage hazardous substances and hazardous wastes in accordance with applicable Army, federal, and state regulations.</p> <p>Section 3.9.4 revised to clarify that there are no groundwater wells within the State-owned land or impact area. PTA has no groundwater extraction wells.</p>
Kristen Caskey	State, DOH, Clean Air Branch	<p>Aloha, Thank you for the opportunity to provide comments on the subject project. Based on review of the Army Training Land Retention at Pohakuloa Training Area Draft EIS, CAB has no further comments at this time. Please see our standard comments at: <a href="https://health.hawaii.gov/cab/files/2022/05/Standard-Comments-for-Land-Use-Reviews-Clean-Air-Branch-2022.pdf">https://health.hawaii.gov/cab/files/2022/05/Standard-Comments-for-Land-Use-Reviews-Clean-Air-Branch-2022.pdf</a></p> <p>Please let me know if you have any questions or concerns.</p> <p>--- Kristen Caskey, EHS <a href="mailto:Kristen.caskey@doh.hawaii.gov">Kristen.caskey@doh.hawaii.gov</a> Clean Air Branch Hawaii State Department of Health</p>	<p>We understand that the Hawaii State Department of Health Clean Air Branch has provided their standard comments, and has no further comments at this time. Text added to EIS Section 3.6 regarding requirements for control of fugitive dust in Hawaii Administrative Rules Section 11-60.1-33.</p> <p>Sections 3.6.4 and 3.6.6 revised to state PTA manages and would continue to manage fugitive dust via 1) erosion control and stabilization techniques (revegetation, erosion control structures, site hardening, dust palliatives) under the Land Rehabilitation and Maintenance component of the Integrated Training Management Program (USAG-HI &amp; USARPAC, 2013), 2) adherence to Unified Facilities Criteria 3-250-09FA, Aggregate Surfaced Roads and Airfields Areas, which has dust control requirements for aggregate surfaced roads and airstrips of airfields at Army installations, and 3) best management practices such as maintenance of roads and training trails, maintenance of vegetative cover, periodic application of water to control dust, and modifying training during high risk conditions. Integrated Training Management Program Land Rehabilitation and Maintenance project BMPs are assessed annually during Range and Training Land Assessment reviews (U.S. Army Hawaii Range Division, 2022).</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Sven Lindstrom	State, DOH, HEER Office	<p>1. Although the lease agreement states that the Government will have 60 days to clean up unexploded ordnance (UXO) and munitions debris (MD) after surrendering the land back to the state, this is not sufficient time to conduct a thorough evaluation and cleanup of munitions hazards at the site. The HEER Office oversees clean-up activities at DoD sites in Hawaii under a DoD-State Memorandum of Agreement (DSMOA) Cooperative Agreement. The HEER Office does not oversee clean-up at active ranges. Cleanup of former munitions site under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) process required by DoD takes years, sometimes decades to complete. Investigation of potential munitions hazards and clean-up while the Army still controls the property is preferable so that the State will not be forced to wait an indeterminant amount of time to recover the property following the expiration of the lease agreement. The HEER Office recommends that language be included in the DEIS to encourage the Army to begin munitions response activities on the state-owned land as soon as possible. In the event that the lease is extended, the HEER Office recommends that a requirement be included in the lease to conduct ongoing UXO investigations and clean up during the lease period and a final UXO cleanup prior to the return of the land to the State.</p>	<p>The Army agrees that 60 days is not sufficient time to conduct appropriate cleanup activities. In accordance with the lease and under the provisions of existing law, the Army retains responsibility for cleanup and restoration of former training areas. After the lease expires, if deemed necessary, the Army would follow Army regulations to determine how and when the cleanup and restoration of State-owned land not retained would occur, following the CERCLA process.</p> <p>Section 3.5 revised with relevant information regarding the Department of Defense and State Memorandum of Agreement Cooperative Agreement, which does not apply until the remediation process begins.</p> <p>The Army's cleanup efforts after training exercises are discussed in Section 3.5.4.11. Text clarified to note that the Army removes or deactivates all live and blank ammunition upon completion of a training exercise in compliance with the lease and removes solid waste prior to departing a training area or range facility in accordance with the U.S. Army Garrison, Pohakuloa (USAG-PTA) External Standard Operating Procedures (2018).</p>
Sven Lindstrom	State, DOH, HEER Office	<p>2. The DEIS references an Environmental Condition of Property (ECOP) study, but this document was not made available on the project website. The HEER Office requested this document from Army Garrison Hawaii, but it was not provided. According to the DEIS, the ECOP identified potential munitions-related hazards on the state-owned land, as well as other potential environmental hazards. The HEER Office recommends that the Army address all of these hazards and provide documentation to the HEER Office for our records. The sites that are described as former Munitions and Explosives of Concern (MEC) sites or ranges should be assessed and cleaned-up under CERCLA since the Environmental Protection Agency (EPA) Military Munitions Rule only exempts operational ranges for EPA regulations. If a new lease is to be prepared for the state-owned land, the HEER Office recommends that a requirement of the lease include the identification and cleanup of all environmental hazards on the state-owned land.</p>	<p>The purpose of the Environmental Condition of Property report is to establish baseline environmental conditions at PTA, and the report was prepared to formulate an opinion of the environmental condition of the Subject Site (State-owned land leased by the Army). To the extent feasible, the Army has made relevant resources available to the public. Additional Army documents are located at: <a href="https://home.army.mil/hawaii/index.php/ptaeis/public-info">https://home.army.mil/hawaii/index.php/ptaeis/public-info</a>.</p> <p>Comment noted. The Army will work with HDOH, HEER to address potential future remediation activities in accordance with CERCLA.</p> <p>In accordance with the lease and under the provisions of existing law, the Army retains responsibility for cleanup and restoration of former training areas. After the lease expires, if deemed necessary, the Army will follow Army regulations to determine how and when the cleanup and restoration will occur in State-owned land not retained, following the CERCLA process.</p> <p>As an operational range, PTA is under the Military Munitions Rule. After the lease expires, State-owned land not retained would no longer be under the Military Munitions Rule.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Sven Lindstrom	State, DOH, HEER Office	<p>3. Section 1.2.5 of the DEIS states that more than 20,000 acres of the state-owned land is designated as "maneuver area." The HEER Office recommends that this area be investigated for historic munitions use prior to the end of the lease and cleaned-up if necessary. In fact, Section 3.5.4.11 states that "there is a potential for MEC to be found anywhere on the State-owned land," so this recommendation should extend to all the state-owned land. The HEER Office also recommends that any future lease include a requirement to investigate and cleanup munitions across the state-owned land, including at current and former maneuver areas, and to restrict future activities in maneuver areas on state land such that munitions use is not allowed or requires cleanup following use.</p>	<p>In accordance with the lease and under the provisions of existing law, the Army retains responsibility for cleanup and restoration of former training areas. After the lease expires, if deemed necessary, the Army would follow Army regulations to determine how and when the cleanup and restoration of State-owned land not retained would occur, following the CERCLA process.</p> <p>As an operational range, PTA is regulated by the Military Munitions Rule. After the lease expires, State-owned land not retained would no longer be under the Military Munitions Rule.</p> <p>EIS revised to state the lease requires the Army to make every reasonable effort to remove or deactivate all live and blank ammunition from completion of a training exercise or prior to entry by the public, whichever is sooner. The Army's cleanup efforts after training exercises are discussed in Section 3.5.4.11. Text clarified to note that the Army removes or deactivates all live and blank ammunition upon completion of a training exercise in compliance with the lease and removes solid waste prior to departing a training area or range facility in accordance with the U.S. Army Garrison, Pohakuloa (USAG-PTA) External Standard Operating Procedures (2018).</p> <p>As noted in Section 1.5.2, State decisions following acceptance of the EIS may include the land retention estates and methods as well as associated terms (e.g., lease compliance conditions) in any new real estate agreement.</p>
Sven Lindstrom	State, DOH, HEER Office	<p>4. Figure 1-3 depicts many "Firing Points" located within the state-owned land, with the impact area located on Federal Government property to the south. According to Section 2.1.2, 91% of the firing points at the Pohakuloa Training Area are on the state-owned land. Munitions Constituent (MC) contaminants such as heavy metals, explosives, and propellants are often associated with firing points; discarded military munitions (DMM) can also sometimes be found at or near firing points. The HEER Office recommends investigating and cleaning up of these firing points prior to the end of the current lease period and, should the lease be extended, making ongoing investigation and cleanup of firing points a requirement of the new lease agreement.</p>	<p>In accordance with the lease and under the provisions of existing law, the Army retains responsibility for cleanup and restoration of former training areas. After the lease expires, if deemed necessary, the Army would follow Army regulations to determine how and when the cleanup and restoration of State-owned land not retained would occur, following the CERCLA process.</p> <p>As an operational range, PTA is regulated by the Military Munitions Rule. After the lease expires, State-owned land not retained would no longer be under the Military Munitions Rule.</p> <p>EIS revised to state the lease requires the Army to make every reasonable effort to remove or deactivate all live and blank ammunition from completion of a training exercise or prior to entry by the public, whichever is sooner. The Army's cleanup efforts after training exercises are discussed in Section 3.5.4.11. Text clarified to note that the Army removes or deactivates all live and blank ammunition upon completion of a training exercise in compliance with the lease and removes solid waste prior to departing a training area or range facility in accordance with the U.S. Army Garrison, Pohakuloa (USAG-PTA) External Standard Operating Procedures (2018).</p> <p>As noted in Section 1.5.2, State decisions following acceptance of the EIS may include the land retention estates and methods as well as associated terms (e.g., lease compliance conditions) in any new real estate agreement.</p>
Sven Lindstrom	State, DOH, HEER Office	<p>5. Section 3.5.4 discusses the findings of the ECOP. Several of these sites, including the Former Bazooka Range(s), the Former Tank Gunnery Range, the Potential Former Burn Pan, and the Former Davy Crockett Weapons System Range are not in HEER Office's files. The HEER Office recommends that the Army provide documents for these sites to the HEER Office and engage the HEER Office regarding the investigation and cleanup of these sites. The HEER Office recommends that cleanup of all the sites in the ECOP on state-owned land, including potential depleted uranium contamination associated with the former Davy Crockett range, be conducted prior to returning the land to the State. The HEER Office further recommends that investigation and cleanup of these sites be prioritized in any new lease agreement.</p>	<p>The Army will collaborate with DOH, HEER Office in a good faith effort about how it manages active ranges.</p> <p>In accordance with the lease and under the provisions of existing law, the Army retains responsibility for cleanup and restoration of former training areas. After the lease expires, if deemed necessary, the Army would follow Army regulations to determine how and when the cleanup and restoration of State-owned land not retained would occur, following the CERCLA process.</p> <p>As an operational range, PTA is regulated by the Military Munitions Rule. After the lease expires, State-owned land not retained would no longer be under the Military Munitions Rule.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Sven Lindstrom	State, DOH, HEER Office	6. Section 3.5.6.4" Please clarify here and elsewhere in the document (e.g., Section 3.8.6.4) that in the event of a No Action Alternative, the Army would retain responsibility for ongoing management of the POTA-06 former landfill on the state-owned land and an agreement will be required to allow the Army access for necessary inspection and maintenance of the controls at that site. ?	Sections 3.5.6.4, 3.8.6.4, and 3.15.6.4 revised to State the Army would maintain ongoing management of the POTA-06 former landfill on State-owned land if the No Action Alternative is selected, pending an agreement allowing the Army access for necessary inspection and management. When the lease expires, maintenance of the landfill and land use controls may be negotiated in the transfer of the property.
Sven Lindstrom	State, DOH, HEER Office	7. Table 3-24 describes conditions under Alternative 1 as "Adverse impacts from continued contamination but minimized with the management of MEC and radioactive contaminants." Please include a description of current management of MEC and radioactive materials on the state-owned land. Previous descriptions of these hazards did not describe any active management of these hazards other than possibly restricted access. ??	<p>Sections 3.5.4.11 and 3.5.4.12 have been revised to include a more robust description of current management of MEC on State-owned land, which includes the Nuclear Regulatory Commission license and DoD Manual 4140.72.</p> <p>Section 3.5.4.12 revised to clarify that the State-owned land only includes one depleted uranium firing location, the State-owned land does not include the four depleted uranium impact locations, and surveys did not identify any indication of depleted uranium-containing materials on the State-owned land. No radioactive materials are used on the State-owned land.</p> <p>In accordance with the lease and under the provisions of existing law, the Army retains responsibility for cleanup and restoration of former training areas. After the lease expires, if deemed necessary, the Army would follow Army regulations to determine how and when the cleanup and restoration of State-owned land not retained would occur, following the CERCLA process.</p>
David Smith	State, DLNR Division of Forestry and Wildlife	<p>Subject: Hawaii Department of Land and Natural Resources (DLNR), Division of Forestry and Wildlife (DOFAW) Comments on PTA Draft EIS Alternatives The following reflects input from Administrative and Hawaii Branch staff on the PTA Draft EIS Alternatives. Staff members prefer Alternative 2 or Alternative 3. Both would allow for better public and resource management access in the area. Under Alternative 2, all leased land north of Daniel K. Inouye Highway (DKI) (a total of 3,300 acres) would be excluded from the lease renewal, returned to DLNR, and added to the Mauna Kea Forest Reserve and Kaohe Game Management Area (GMA). The PTA water tanks north of DKI should be carved out and retained by PTA. This will allow access to the forest reserve and game management area from DKI. Currently, the gates are locked from DKI. This will allow for access to hunting, recreation, and federally mandated sheep and goat removal. Alternative 3, which excludes training areas 1, 2, 10, 11, 16, 17, 19, 20, 21, and 22 from the lease, for a total of 12,900 acres would provide the above access and activities, and would further provide additional lands for management of native species and ecosystems, including Threatened and Endangered (T&amp;E) species, forest management, and forest and outdoor recreation, including public hunting. There may be additional areas not included in Alternative 3 that would provide additional opportunities to protect and manage natural, cultural, and recreational resources if they were included in this alternative. This should be further discussed with DLNR/DOFAW. Training areas 20 and 22 are adjacent to portions of the Pu'u Anahulu GMA contain some of the highest concentration of T&amp;E species in the area along with the highest quality forest and shrubland. Training action could pose threats to those resources. The Anahulu I conservation area contains six endangered species and at least six locally rare species (or species of concern). All lands that are to be excluded from the lease renewal should be swept for UXO and other hazardous materials prior to returning the lands to DLNR.</p>	<p>Thank you for sharing your preference and perspective regarding Alternatives 2 and 3 and how they provide greater access opportunities.</p> <p>Comment under advisement. Alternative 3 is the minimum land retention area to meet the Army's purpose and need; however, the request to include additional lands will be considered in decision making.</p> <p>Section 3.2 addresses recreation. Section 3.3 addresses public and resource management access, game areas, hunting, threatened and endangered species, and forest management. Section 3.4 addresses cultural resources. Section 3.5 addresses hazardous substances and hazardous wastes, including munitions and explosives of concern.</p> <p>In accordance with the lease and under the provisions of existing law, the Army retains responsibility for cleanup and restoration of former training areas. After the lease expires, if deemed necessary, the Army would follow Army regulations to determine how and when the cleanup and restoration of State-owned land not retained would occur, following the CERCLA process.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
David Smith	State, DLNR Division of Forestry and Wildlife	<p>Access 1. DOFAW would like access to rock quarries within training areas 5, 9, 13, and 21 on PTA lease land for DOFAW projects on adjoining managed lands such as road and firebreak maintenance, provided that the materials are safe from hazardous materials. 2. Water wells on leased land could provide water to DOFAW for forest restoration, fire suppression, plant nursery, and facilities. 3. Appropriate signage marking the boundary of PTA should be posted. 4. DOFAW would like public and management access to Pu'u Anahulu GMA from DKI through the Army's fee simple land (Keamuku) in three locations. 5. The public, DLNR, and the Hawaii Police Department should be provided access to the military shooting range for firearms training. 6. Units 20 and 22 of the State-owned lease lands abut Pu'u Anahulu GMA. DLNR-DOFAW has a fence in progress along this boundary (REPI-funded fencing, the fence will attach to PTA fence on the boundary). DOFAW is in the process of getting access permits so that DOFAW and PCSU staff may utilize the PTA/Pu'u Anahulu boundary road. The road is primarily located on the State-owned lease lands but also crosses over the boundary into Pu'u Anahulu GMA. An access buffer along that road would allow DOFAW staff and their contractors to access these areas without needing to get permits for access or contact range control when they are accessing the area. Permits are annual and require a criminal background check, which is cumbersome. 7. We recommend allowing non-exclusive use of the leased areas that are outside of the fenced portions bordering Pu'u Anahulu ahupua'a.</p>	<p>The suggested mitigation measures are not associated with potential impacts from the Proposed Action or connected actions (e.g., lease compliance issues); therefore, they are not addressed in the EIS. The Army will take DOFAW's suggestions under consideration. The Army appreciates its cooperative and collaborative relationship with DOFAW for areas such as the hunting management and game populations, wildfire prevention and suppression, and wildlife research.</p>
David Smith	State, DLNR Division of Forestry and Wildlife	<p>Hunting 1. DOFAW requests DoD provide mammal and bird hunting on lease land on days when there is no training. Details of how PTA and DLNR will cooperate on hunting should be more clearly defined. Feral sheep and goats are overgrazing the existing vegetation and causing damage to native dry forests. Animal numbers should be significantly reduced, preferably with increased public hunting.</p> <p>Fire Suppression 1. There is a need to establish additional fire suppression dip tanks to protect PTA and surrounding DOFAW-managed lands. PTA currently has 11 fire suppression dip tanks. DOFAW would suggest consideration for tanks in the following locations:</p> <ul style="list-style-type: none"> <li>a. Below Pu'u Ke'eke'e in the bottom corner of TA 20 or off old Ke'eke'e road.</li> <li>b. Near the bottom of DKI on the south side of DKI adjacent to Pu'u Anahulu GMA.</li> <li>c. A dip tank in TA 1 that would serve the eastern portions of PTA and help to protect remaining unfenced areas of Palila Critical Habitat as well as the state lease lands in that vicinity. d. A tank near the Girl Scout camp is at a high point where helicopters could fly with a full load of water down in elevation.</li> </ul> <p>T&amp;E Plant Species 2. Any federally listed plant species on state lands leased to PTA should be fenced individually or collectively where appropriate. A 50-foot managed fuel break should be installed around each plant or plant cluster and maintained for the life of the lease. Signage informing active-duty personnel, contractors, and the public informing them of the status of the area should be included and marked as appropriate for each plant or cluster.</p>	<p>As one of the signatories of the PTA Integrated Natural Resources Management Plan (INRMP), the state is welcome to reach out to USAG-HI Department of Public Works, Environmental Division to discuss suggested natural resource management measures.</p> <p>Hunting access is governed by Army Regulation 200-1 (9)(e) and DoD Instruction 4715.03 and described in Section 3.9 of the PTA INRMP. The INRMP states, "Public access for outdoor recreational activities and the harvest of game mammals and birds is permitted when compatible with environmental conditions or restrictions and the objectives of sustained multiple use and the continued accomplishment of the military's mission. All activities must comply with state, federal, and U.S. Army statutes and regulations and is controlled by the Garrison Commander (USAG-P 2016)." Applicable text from the documents added to Section 3.3.</p>
David Smith	State, DLNR Division of Forestry and Wildlife	<p>3. On pages 3-27, 3-28, and Table 3-3. The narrative and table showing the State T/E status are not current - all 20 Federal T&amp;E plants have the same status at the State level.</p>	<p>Species text and table 3-3 has been updated with the most current available information.</p>
David Smith	State, DLNR Division of Forestry and Wildlife	<p>Page 3- 23 lists impacts of invasive plants but does not include the risk of moving invasive species to PTA from other Training Areas (i.e. Chromolaena odorata, CRB). This potential should be included in the NEPA documents.</p>	<p>PTA invasive species discussion and management is presented in Section 3.3.4.2, 3.3.4.3, and 3.3.4.4. The risks of moving invasive species from other trainings areas is addressed in this section.</p>
David Smith	State, DLNR Division of Forestry and Wildlife	<p>4. The areas not retained in Alternative 2 do not have any records of T&amp;E plants. The areas not retained in Alternative 3 have a number of T&amp;E plant species and are important areas for the recovery of those plants.</p>	<p>Thank you for your comment. Section 3.3 (Biological Resources) of the EIS has been revised to include additional information on T&amp;E species and natural resource management implementation by the Army.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
David Smith	State, DLNR Division of Forestry and Wildlife	Comments on Invertebrates 1. In Section "3.3.4.2 - Wildlife Invertebrates", the following is stated: Not much is known about invertebrates at PTA, although more than 500 species of arthropods have been identified on PTA from surveys conducted in the 1990s." This statement is inadequate, as there is no attempt to characterize the invertebrate fauna at the site. The 500 species should be adequately described with adequate avoidance, minimization, and mitigation described for impacts to each native species and/or habitat area. 2. The document states: "Two federally listed invertebrates— <i>Hylaeus anthracinus</i> and <i>Manduca blackburni</i> —have been documented on PTA. In 2004, a single specimen of <i>H. anthracinus</i> was collected at PTA but the exact location is unknown (USAG-PTA, 2020c). This bee species, typically found along coasts, was found in a <i>K. coriacea</i> fruit capsule in an unknown location and was suspected to have been accidentally transported. A 2018 <i>Hylaeus</i> survey did not record any <i>H. anthracinus</i> ." It should be noted that <i>Hylaeus anthracinus</i> is known from dryland forests, not just coastal areas, so transport to the site seems unlikely.	Section 3.3.4 has been revised to include additional information on native and protected species. Section 3.3.6 has been updated with applicable analysis. Existing management measures are addressed in Section 3.3.4.5 and best management practices and standard operating procedures are located in Appendix E. Additional information includes a summary of documented insects and arachnids to more adequately cover invertebrates and notes that a 2018 <i>Hylaeus</i> species survey that did not record any individuals. Section 3.3.4.4 of the EIS has been updated to note that <i>Hylaeus anthracinus</i> is known from coastal and lowland dryland forests (up to 2,000 feet). The dryland forests at PTA are too high in elevation to provide suitable habitat for <i>H. anthracinus</i> . The single individual collected at PTA in 2004 was suspected to be a vagrant. For additional information on this species see page 26 of 81 FR 67786-67860 Endangered Status for 49 Species From the Hawaiian Islands; Final Rule.
David Smith	State, DLNR Division of Forestry and Wildlife	Trails 1. Ancient and Historic trails and associated archeologic features data should be shared with DLNR's Nā Ala Hele Trails and Access Program. Per HRS 198D, the Nā Ala Hele program serves as the consulting agency regarding trails. All 6E and 106 compliance processes should include consultation with the Hawai'i Island Nā Ala Hele staff. Additionally, the applicant should facilitate site visits with Nā Ala Hele staff. 2. Typically, an Archeological Inventory Survey is included in the EIS process. DLNR recommends they include an AIS in the next iteration of the EIS.	As noted in Section 1.4, HRS Chapter 6E compliance is separate from the EIS process. The Proposed Action is an administrative action; no new activities are proposed. The EIS relies on existing studies to present what is known of current conditions, and the full summary is contained in the Archaeological Literature Review (Appendix J).  Section 3.4.2 of the EIS documents the NHPA consultation process that resulted in a 2018 programmatic agreement to resolve adverse effects at PTA from ongoing activities.
David Smith	State, DLNR Division of Forestry and Wildlife	Endangered Wildlife 1. The last final paragraph on page 3-31 discusses the occurrence of a Band-rumped Storm Petrel ( <i>Oceanodroma castro</i> ) nest discovered on PTA in 2015. Activity at this burrow was confirmed and subsequent monitoring determined the occurrence of up to eight potential nests, with video evidence of four active nests/burrows on US Government land. The last sentence on this page further speaks of the importance of this observation. We see no mention in relevant sections of the document, however, of any subsequent or further monitoring at the site or actions taken (or to be taken) to protect this probable nesting site/colony. What is the current status of these nests or what was their fate? Will there be any predicted impacts to the colony via the proposed alternatives? The description of impacts on wildlife and natural resources is vague and the discussion of avoidance or mitigation actions is limited. This needs to be addressed in the final version of the EIS.	The 2015 band-rumped storm petrel nest was not on State-owned land, no nests have been detected on State-owned land. <b>Appendix K</b> discusses monitoring work that the USAG-PTA staff do for this species.
Darlene Nakamura	State, DLNR, Engineering Division	In addition to the comments submitted separately by Chairperson Suzanne Case, attached are comments from the (a) Engineering Division and (b) Land Division-Hawaii District on the subject matter. We understand the Division of Forestry and Wildlife may also submit comments separately. --- Thank you for the opportunity to review and comment on the subject matter. The Land Division of the Department of Land and Natural Resources (DLNR) distributed or made available a copy of your request pertaining to the subject matter to DLNR's Divisions for their review and comments.  In addition to comments submitted separately by Chairperson Suzanne Case, attached are responses from the (a) Engineering Division and (b) Land Division-Hawaii District on the subject matter. We understand the Division of Forestry and Wildlife may also submit comments separately. Should you have any questions, please feel free to contact Darlene Nakamura at (808) 587-0417 or email: darlene.k.nakamura@hawaii.gov. --- We have no additional comments.	Thank you for the DLNR Engineering Division's review of the Draft EIS for the Army Land Retention Project at Pōhakuloa Training Area. We understand that Division has no additional comments.

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Lauren Yasaka	State, DLNR, Land Division	<p>After review of the document, the Land Division finds that the document, as currently written, does not meet the requirements of Chapter 343, HRS and Chapter 11-200.1, HAR. Further, Land Division notes that given the major data gaps in the current document, should those data gaps be filled, the revised EIS may be subject to further public review and comment.</p> <p>Please keep in mind that this list is not exhaustive. The document as written is so insufficient as it relates to HEPA requirements that we were unable to review it in its entirety even though the review period was extended to 60 days.</p>	<p>The EIS has been substantially revised to include information from agency and public comments. For example, the EIS has been revised to remove the 250 acres of DHHL-administered land from Alternative 1 and Section 3 has been revised to add additional information (e.g., existing management measures to reduce ongoing impacts) and better identify when no additional information or no more current information is available.</p>
Lauren Yasaka	State, DLNR, Land Division	<p>The DEIS analyzes a fee simple acquisition by the Federal government and does not analyze a lease or other disposition scenario in which the land remains under ownership and jurisdiction of the State. As currently written, the DEIS does not comply with HRS §343-5, which states that "except for otherwise provided, an environmental assessment [or EIS] shall be required for actions that: (1) Propose the use of state or county lands...; (2) Propose any use within any land classified as a conservation district...." In its current form, the DEIS analysis is based on the Federal Government retaining the State lands via title (ownership through fee simple title) which would not trigger the need for a HEPA EIS. Furthermore, the DEIS should thoroughly analyze the lands being retained via lease and/or other type of land disposition in which the land still remains under ownership and jurisdiction of the State in order to be in compliance with HRS §343-5, as well as analyze other alternative retention methods being considered by the Applicant. While we understand that the Applicant decided to analyze the fee retention method as they believe it to be the most impactful, a lease or similar disposition with ongoing monitoring, preservation, and mitigation obligations, is a viable alternative that would require a different and more detailed analysis under HEPA. The absence of any meaningful analysis under a lease or other land disposition scenario fails to address compliance with applicable State laws which also ensures proper mitigation for probable impacts. Finally, the DEIS should more thoroughly justify its assertion that fee title ownership results in the greatest impact.</p>	<p>Section 2.3 revised to clarify there would be no difference in ongoing activities on the State-owned land retained under the land retention estates selected for analysis (i.e., fee simple title, lease, easement). The only difference is that under lease and easement the Army would adhere to lease/easement conditions, assumed Army obligations in the Court Ordered Management Plan, and applicable State processes/administrative requirements. Because ongoing activities, lease/easement conditions, assumed Army obligations in the Court Ordered Management Plan, and applicable State processes/administrative requirements would be the same under lease and easement, the impacts for lease and easement would be the same; therefore, the EIS only analyzes fee simple title and lease.</p> <p>EIS revised to include information related to ongoing best management practices, standard operating procedures, management measures, and mitigation measures to highlight ongoing environmental monitoring and conservation efforts (see Existing Management Measures added to each resource area in Section 3).</p>
Lauren Yasaka	State, DLNR, Land Division	<p>The DEIS makes statements throughout that allude to future projects such as modernization of "facilities, utilities, and infrastructure that will eventually require separate NEPA compliance." An additional statement is made under Section 2.2.5, subheading Alternative 6, which states "The Army must have at least a 25-year lease to permit permanent construction." While it is unclear whether such modernization projects or construction projects would occur on State land, if the intent is for these projects to occur on State land then pursuant to §11-200.1-10, "A group of actions shall be treated as a single action when: (1) The component actions are phases or increments of a larger total program; (2) An individual action is a necessary precedent to a larger action; (3) An individual action represents a commitment to a larger action; or (4) The actions in questions are essentially identical and a single EA or EIS will adequately address the impacts of each individual action and those of the group of actions as a whole." Thus, should these "future" uses be on State land, those uses would need to be adequately included and analyzed within this document or you may want to consider preparing a Programmatic EIS which would commit the Army to conducting further HEPA compliance as those future projects come on-line.</p>	<p>EIS revised to clarify that the Proposed Action does not include any construction or modernization projects in the State-owned land.</p> <p>Reasonably foreseeable future actions (not related to the Proposed Action) are analyzed as cumulative effects in Section 4. Section 4.3.1 revised to clarify that no reasonably foreseeable future military construction projects (i.e., major construction costing at least \$10 million) are proposed within the State-owned land, but two smaller maintenance-type projects are proposed within the State-owned land.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Lauren Yasaka	State, DLNR, Land Division	<p>In the Executive Summary, there are missing items as prescribed under HAR §11-200.1-24(d). Specifically, ES.12 should include "Unresolved Issues" as a part of the heading to be consistent with §11-200.1-24(d)(5) and there is no list of permits or approvals as required under §11-200.1-24(d)(6). Also, as the document makes references to previous NEPA documents for Army activities on these lands, pursuant to §11-200.1-24(d)(7), there should be a list of relevant EAs or EISs considered in the analysis of the preparation of the EIS.</p>	<p>The Executive Summary reflects that Section 5.2 has been renamed "Incomplete Information/Unresolved Issues" to reflect the content requirements of NEPA and HEPA. <b>Appendix A, NEPA-HEPA Compliance Guide</b>, has been added to identify the specific section in the EIS where information is provided as required by NEPA and HEPA.</p> <p>A list of previous NEPA compliance documents for training at PTA has been added to <b>Appendix E, NEPA and Other Environmental Planning Documents and Existing Management Measures</b>. State permits and approvals required under HEPA have been added, where appropriate, in the regulatory framework section of each applicable resource in Chapter 3.</p>
Lauren Yasaka	State, DLNR, Land Division	<p>Pursuant to HAR §11-200.1-24(g)(6), the DEIS shall contain a summary of "technical data, diagrams, and other information necessary to enable an evaluation of potential environmental impact by commenting agencies and the public..."</p> <p>The Land Division finds that the document is insufficient in this matter. There are numerous studies and plans referenced in the document, but were not included. At minimum, any study, plan, or document referenced that is used to lay the basis of the existing environmental setting of the project or as evidence to support appropriate management practices/mitigation measures currently in practice should be included in the appendices.</p> <p>We also note that many of the referenced studies and/or plans are over 10 years old. While there is nothing specifically written within State Statute or Rules, it has been the policy that should any of these documents be over 10 years old, they should be reviewed and updated as appropriate so that the DEIS is based on current information. Therefore, for those studies, reports, plans, etc. that have passed this 10-year threshold, we request that those studies be updated as appropriate and included.</p>	<p>The EIS has been revised to incorporate relevant details from the plans cited to document the best management practices (BMPs) and standard operating procedures (SOPs) employed by the Army. The Proposed Action does not propose new activities but would facilitate ongoing activities previously analyzed utilizing the studies cited in this EIS. The EIS presents existing conditions based on relevant studies. As you've noted, there is regulatory definition of time in NEPA and HEPA related to relevance of existing studies.</p> <p>To the extent feasible, current on-line URL links are provided in Chapter 6 (Reference List) following the reference citation. The USAG-HI website for current publicly releasable documents is: <a href="https://home.army.mil/hawaii/index.php/ptaeis/public-info">https://home.army.mil/hawaii/index.php/ptaeis/public-info</a>.</p>
Lauren Yasaka	State, DLNR, Land Division	<p>Pursuant to HAR §11-200.1-24(i), "The draft EIS shall include a description of the environmental setting...Special emphasis shall be placed on environmental resources that are rare or unique to the region and the action site (including natural or human-made resources of historic, cultural, archaeological, or aesthetic significance)."</p> <p>There are several sections within the document in which the information is insufficient and would appear that the Applicant has made little to no effort to fill in any data gaps. Examples include the following:</p> <p>Under Section 3.3.4.2, subheading invertebrates, the only information provided is that "Not much is known about invertebrates, although more than 500 species of arthropods have been identified on PTA from surveys conducted in 1990s." This level of information is unacceptable, and appropriate invertebrate surveys and/or updates to existing arthropod surveys should be conducted and included in the DEIS as appropriate.</p>	<p>Section 3.3, Biological Resources, has been revised to include more recent data, including but not limited to a summary of documented insects and note that a 2018 Hylaeus species survey that did not record any individuals. <b>Appendix K</b> provides additional species information.</p>
Lauren Yasaka	State, DLNR, Land Division	<p>Under Section 3.3.4.3, subheading Protected Birds, regarding the Band-rumped storm petrel, it states that "it is unknown how this species may use habitats in PTA." This information appears to be important to determine appropriate mitigation measures or management activities as it pertains to the species.</p>	<p>No band-rumped storm petrel nests have been detected on State-owned land. The nest discovered in 2015 is being managed through predator control (live and lethal trapping for cats, mongoose, and rodents), nest surveys with a detector dog, and monitoring of potential nests via video surveillance. <b>Appendix K</b> discusses monitoring work that the USAG-PTA staff do for this species.</p>
Lauren Yasaka	State, DLNR, Land Division	<p>Section 3.3.4.3 Protected Species and Areas states that the Army is preparing a programmatic biological assessment which "covers newly listed species and critical habitats." It would appear that none of this information is included within the DEIS and that this assessment would be a critical study that should be included the DEIS.</p>	<p>The Army is preparing a draft programmatic biological assessment (PBA) that addresses a broader scope than what the EIS addresses, and the PBA is not complete. Authors have included the most updated information available to the Army and applied relevant information that will be used in the PBA in the EIS. Newly listed species and Palila critical habitat are discussed within existing conditions of the biological resources section of this EIS in Section 3.3.4.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Lauren Yasaka	State, DLNR, Land Division	<p>Regarding archaeological investigations, the DEIS basically states that only a little over half of the State lands have been surveyed for archaeological resources. While we recognize that a Literature Review was done for the State lands in October 2021, we note that it was specifically done to meet NEPA requirements, and the information provided is not sufficient to cover the data gaps for the un-surveyed portion of State lands.</p> <p>Further, while we are not suggesting that an Archaeological Inventory Survey (AIS) be done for the remaining, un-surveyed portions of State lands, we would, at minimum, request an archaeological field inspection be done so that the entire area of potential effect (APE), which would include all the lands being considered in the lease, be covered. This would also support HRS Chapter 6E review and compliance which would support mitigation to any archaeological resources.</p>	<p>Figures have been added to show where surveys have been completed and the general locations and types of sites within State-owned land. Reasons for unsurveyed areas added to the EIS.</p> <p>Stipulations to take into account the effects of routine military activities on historic properties at PTA are documented in the 2018 Programmatic Agreement among the U.S. Army, the Hawaii State Historic Preservation Officer, and the Advisory Council on Historic Preservation. Undertaken in consultation with Native Hawaiian Organizations, the PA fulfills the National Historic Preservation Act Section 106 for the Area of Potential Effect including PTA. EIS Section 3.4.4.6 describes the Army's responsibilities for cultural management under the agreement to minimize impacts to sites.</p> <p>The ongoing Army activities described in EIS Section 2.1 would continue with the Proposed Action (land retention); no new activities are proposed. HRS Chapter 6E would be undertaken when a State agency issues a permit or entitlement and is separate from the NEPA and HEPA process (see EIS Section 5.3.2).</p>
Lauren Yasaka	State, DLNR, Land Division	<p>Pursuant to HAR §11-200.1-24(j), "The draft EIS shall include a description of the relationship of the proposed action to land use and natural or cultural resource plans, policies, and controls for the affected area. Discussion of how the proposed action may conform or conflict with objectives and specific terms of approved or proposed land use and resource plans, policies, and controls, if any, for the affected area shall be included. Where a conflict or inconsistency exists, the draft EIS shall describe the extent to which the agency or applicant has reconciled its proposed action with the plan, policy, or control, and the reasons why the agency or applicant had decided to proceed, notwithstanding the absence of full reconciliation.</p> <p>As currently written, the DEIS does not meet the above stated requirement. We note that, the project area is located within an area now designated as the State Land Use Conservation District, Resource Subzone. However, the DEIS lacks information on how the Applicant's proposed action conforms with the purpose of the Conservation District and objective of the Resource subzone. The DEIS should be revised to include a discussion on how the proposed action and mitigating measures are consistent with the purpose of the Conservation District and the objective of the Resource subzone.</p>	<p>In compliance with HAR 11-200.1-24(j), Section 5.3 of the EIS provides the discussion of how the Proposed Action conforms or conflicts with objectives and specific terms of approved or proposed land use and resource plans, policies, and controls for the affected area. The discussion also complies with 40 CFR Part 1502.16(c) under NEPA.</p> <p>Revisions to Section 5.3 describe the administrative processes to use of the State-owned land.</p>
Lauren Yasaka	State, DLNR, Land Division	<p>Section 1.4.1 basically alludes to the uses at PTA being non-conforming and states that "HAR Chapter 13-5 provides for authorization of additional uses through discretionary permits from the State Board of Land and Natural Resources." This statement is problematic as non-conforming uses within the Conservation District are regulated by §13-5-7, HAR. This section mainly allows for maintenance and repair of non-conforming uses, however, nowhere does it suggest that "additional" uses can be authorized.</p>	<p>EIS Section 1.4.2 has been refined to describe the administrative processes for use of the State-owned land. Management activities for natural and cultural resources conducted by the Army as part of its ongoing activities have been added to this EIS. The Army has spent at least \$3M annually for natural and cultural resource management at PTA.</p>
Lauren Yasaka	State, DLNR, Land Division	<p>Section 1.5.2 states that one of the possible decisions that may need to be made by State agencies is "if presented with a CDUP application to permit military uses of lands in the State's conservation district (resources subzone), consider allowable uses and management actions to meet the purpose of the conservation district." This is an incorrect statement as it is the Applicant's (the Army) responsibility to propose how their "uses" fit within the land uses as described in Chapter 13-5, HAR.</p>	<p>Sections 1.4 and 1.5 of the EIS have been refined to describe the administrative processes for military use of State-owned land.</p>
Lauren Yasaka	State, DLNR, Land Division	<p>Section 3.2.5 states that "The current nonconforming use of State conservation district land is assumed to cease with the lease term. Army could be brought into conformance with conservation district rules as part of the land retention process following the EIS process when the land retention method is known." Please clarify how the Army could be "brought into conformance with conservation district rules."</p>	<p>EIS Section 1.4.2 has been refined to describe the administrative processes for use of the State-owned land. Management activities for natural and cultural resources conducted by the Army as part of its ongoing activities have been added to this EIS. The Army has spent at least \$3M annually for natural and cultural resource management at PTA.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Lauren Yasaka	State, DLNR, Land Division	<p>Pursuant to HAR §11-200.1-24(k), "The draft EIS shall also contain a list of necessary approvals required for the action from governmental agencies, boards, or commissions or other similar groups having jurisdiction. The status of each identified approval shall also be described."</p> <p>The DEIS does not appear to include such a list. The closest thing that Staff could identify is Table 1-1 which is a table of "Anticipated Reviews." Unfortunately, it would appear that this is not a list of approvals, nor does it provide the status of each review.</p>	<p>Table 1-1 has been revised to demonstrate its compliance with HAR §11-200.1-24(k). The table has been renamed to demonstrate that all potential permits, licenses, and approvals necessary for implementation of the Proposed Action were considered. The status of each permit has been added with the location of further discussion within the EIS. Because the Proposed Action is an administrative action (a real estate action) the reviews and approvals are limited.</p>
Lauren Yasaka	State, DLNR, Land Division	<p>Pursuant to HAR §11-200.1-24(l), "The Draft EIS shall include an analysis of the probable impact of the proposed action on the environment and impacts on the natural or human environment on the action. This analysis shall include consideration of all phases of the action and consideration of all consequences on the environment, include direct, and indirect effects..."</p> <p>As currently written, the DEIS fails to meet this requirement. The impact analysis sections for each of the Environmental Resource sections (as determined by the Applicant) are weak and are based on whether the impact is considered "new" versus an ongoing impact which would most likely continue to occur should the Proposed Action move forward. As currently written, it requires the reader to extract these continuing impacts from the existing environmental setting descriptions and it appears that even that information may not be complete. Examples of this include the following:</p>	<p>The EIS has been revised to clarify the ongoing activities (with prior NEPA documents cited) to demonstrate that the current and proposed uses are the same; and to clearly identify ongoing best management practices, standard operating procedures, management measures, and mitigation measures in support of those activities to highlight the Army's ongoing environmental monitoring and conservation efforts.</p> <p>The EIS has been revised to clarify and distinguish ongoing impacts and management measures (due to continuation of ongoing activities) and potential new impacts and mitigation measures (due to administrative action of continuing or ending ongoing activities and implementing connected actions).</p>
Lauren Yasaka	State, DLNR, Land Division	<p>Section 3.3.4.3 states that there are Incidental Take Statements to offset military activity effects on nēnē birds. However, just because Incidental Take Statements exist, does not mean that there is no impact. Rather it would appear that the continuation of military training would continue to impact nēnē birds. Another example of this is with the Hawaiian hoary bat in which there have been several incidences in which loss of roosting habitat has exceeded the annual take limit. It would appear that the continuation of military training exercises could continue to impact the Hawaiian hoary bat and its habitat. However, neither of these are addressed in the Environmental Analysis section for biological resources.</p>	<p>The reference to incidental take statements is meant to demonstrate that the Army has already formally consulted with USFWS on ongoing activities' impacts on listed species, is complying with the Endangered Species Act, and is mitigating adverse effects.</p> <p>The EIS has been revised to clarify the ongoing activities (with prior NEPA documents cited) to demonstrate that the current and proposed uses are the same; and to clearly identify ongoing best management practices, standard operating procedures, management measures, and mitigation measures in support of those activities to highlight the Army's ongoing environmental monitoring and conservation efforts.</p> <p>The EIS has been revised to clarify and distinguish ongoing impacts and management measures (due to continuation of ongoing activities) and potential new impacts and mitigation measures (due to administrative action of continuing or ending ongoing activities and implementing connected actions).</p>
Lauren Yasaka	State, DLNR, Land Division	<p>Section 3.4.6.1 states that "The 2018 PA determined that...some undertakings (activities) may continue to have adverse effects on historic properties" as well as stating that "The continued presence of training personnel may also continue to impact resources through accidental damage or vandalism." However, the document still states that "the proposed action will result in no new impacts." The impact analysis of the continuation of military activities and training is not taken into account in the Environmental Analysis section for cultural resources.</p>	<p>The adverse effects identified in the 2018 NHPA Section 106 PA are resolved (i.e., mitigated) through implementation of the PA for Army activities. Adverse effects that have been resolved through NHPA consultation are not considered 'impacts' for the purposes of NEPA. The Proposed Action is a real estate action that does not propose new Army activities.</p>
Lauren Yasaka	State, DLNR, Land Division	<p>Section 3.7.4, subheading Noise Impacts on Community and Wildlife, states that "Noise generated on PTA is expected to cause wildlife startle, alarm, and alert behaviors, potentially causing rapid movement or flight in avoidance behavior. This could increase the risk of wildlife being struck by live fire, abandoning nest or young, receiving auditory damage, or increasing energy expenditure and food demands. It is also possible that habituation to noise or distraction caused by noise could cause wildlife to be less aware of surrounding and more prone to predation. Staff notes that none of this information is included in the Environmental Analysis.</p>	<p>Wildlife noise impacts in Sections 3.3.4.4, 3.3.6, 3.7.4, and 3.7.6 have been revised to more clearly show the potential impacts on wildlife from noise.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Lauren Yasaka	State, DLNR, Land Division	<p>Pursuant to HAR §11-200.1-24(p), "The Draft EIS shall consider mitigation measures proposed to avoid, minimize, rectify, or reduce impacts, including provision for compensation for losses of cultural, community, historical, archaeological, and fish and wildlife resources, including the acquisition of land, waters, and interests therein. Description of any mitigation measures included in the action plan to reduce significant, unavoidable, adverse impacts to insignificant levels, and the basis for considering these levels acceptable shall be included. Where a particular mitigation has been chosen from among several alternatives, the measures shall be discussed and the reasons given for the choice made. The draft EIS shall include, where possible, specific reference to the timing of each step proposed to be taken in any mitigation process, what performance bonds, if any, may be posted, and what other provisions are proposed to ensure that the mitigation measures will in fact be taken in the event the action is implemented."</p> <p>Overall, the DEIS lacks adequate presentation of mitigation measures. Should the impact analysis sections be revised to be in accordance with HAR §11-200.1-24(l) and include analysis of impacts that would continue to occur due to the proposed project, that analysis may be subject to further public review and comment.</p>	<p>The EIS has been revised to clarify the ongoing activities (with prior NEPA documents cited) to demonstrate that the current and proposed uses are the same; and to clearly identify ongoing best management practices, standard operating procedures, management measures, and mitigation measures in support of those activities to highlight the Army's ongoing environmental monitoring and conservation efforts.</p> <p>The EIS has been revised to clarify and distinguish ongoing impacts and management measures (due to continuation of ongoing activities) and potential new impacts and mitigation measures (due to administrative action of continuing or ending ongoing activities and implementing connected actions).</p> <p>In compliance with HAR 11-200.1-24(p), Sections ES.11, 1.5.1, and 3.17 revised to note that the Army would develop and implement a mitigation monitoring plan for mitigation measures selected in the Record of Decision, if deemed necessary based on the nature of the selected mitigation measures, to ensure any potential mitigation measures selected for implementation in the Record of Decision would be effective and completed in a timely manner.</p>
Lauren Yasaka	State, DLNR, Land Division	<p>From the portions of the document that we were able to review, we have three points of significant concern. The first is regarding archaeological resources. Although the document states that there is a potential for adverse effects on historic properties, no mitigation measures were recommended due to the Applicants adherence to standard operating procedures (SOPs), the Programmatic Agreement (PA), and the Integrated Cultural Resources Management Plan (ICRMP). However, Staff notes that no details of these plans, nor the plans themselves were included in the DEIS, thus the lack of mitigation appears to be problematic.</p>	<p>The Army's ongoing best management practices, standard operating procedures, management measures, and mitigation measures are more fully referenced in the EIS to clarify the ongoing environmental monitoring and conservation efforts undertaken by the cultural and natural resource management teams at PTA.</p> <p>To the extent feasible, relevant resources have been made available to the public.</p>
Lauren Yasaka	State, DLNR, Land Division	<p>In addition, the CIA found that the current military activities on State lands have an adverse effect/significant impact to cultural practices. We find it strange that there are no proposed mitigation measures within the CIA report itself and the only mitigation proposed by the Applicant is "through consultation with Native Hawaiians, and/or other ethnic groups as appropriate, provide access to promote and protect cultural beliefs, practices, and resources." This single mitigation measure proposed in response to the CIA is grossly insufficient.</p>	<p>The EIS (Section 3.4.4.6) and the CIA (Section 9.1) explain that adverse effects from ongoing Army actions are minimized through compliance with the 2018 Programmatic Agreement. Section 8.0 of the CIA assesses the potential impacts based on the Proposed Action (retention of land; no new Army actions) on traditional or customary practices not previously assessed. Therefore, the CIA concludes that cultural access is the impact that would result from the Army's retention of the land.</p> <p>The CIA has been revised to incorporate additional input from Native Hawaiian interviewees.</p>
Lauren Yasaka	State, DLNR, Land Division	<p>Also, as stated in the preceding bulleted section, there appears to be a significant impact to wildlife due to noise yet no mitigation is proposed.</p>	<p>Wildlife noise impacts in Sections 3.3.4.4, 3.3.6, 3.7.4, and 3.7.6 have been revised to more clearly show the potential impacts on wildlife from noise and management measures already in place; Existing management measures are addressed in Section 3.3.4.5 and best management practices and standard operating procedures are located in Appendix E. Based on noise models, these impacts are considered less than significant.</p>
Lauren Yasaka	State, DLNR, Land Division	<p>Please be aware that due to the deficiencies and lack of data found in Chapters 1 through 3, Staff will not be providing any in depth comment on Chapters 4 and 5 as they rely on information presented in the earlier chapters. Therefore, we choose to withhold our comments on those sections until more data is made available for review and comment.</p>	<p>Army considered all comments received and has made revisions to the EIS. Chapters 4 and 5 were updated as appropriate. The EIS meets the content requirements of HRS 343 and HAR 11-200.1. Appendix A, NEPA-HEPA Compliance Guide, has been added to identify the specific section in the EIS where information is provided as required by NEPA and HEPA.</p>

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Lauren Yasaka	State, DLNR, Land Division	There are many sections within the DEIS that discuss the NEPA requirements/process for that particular section (i.e. Section 5.6 Relationship Between Short-term Use of the Environment and Long-Term productivity), however, there is no discussion of the HEPA requirements. As this is a joint NEPA/HEPA document, what is done for one should be done for the other.	HAR §11-200.1-31 provides for a single document to fulfill both NEPA and HRS Chapter 343. The Section 5.6 heading has been revised to include the HEPA nomenclature following the NEPA. Each HEPA requirement detail is generally documented after the NEPA requirement in the text. Using the example of Section 5.6, the first paragraph documents "HAR Section 11-200.1-24(m) states the discussion ' . . shall include the extent to which the Proposed Action forecloses future options or narrows the range of beneficial uses of the environment or poses long-term risks to health or safety.' "
Lauren Yasaka	State, DLNR, Land Division	Within the Executive Summary, under Section ES.11 Potential Mitigation Measures, it says that "The Army could propose mitigation to reduce the severity of adverse impacts from the Proposed Action." The use of "could propose" is problematic as it gives the impression that the Army has a choice not to do any mitigation. This would be unacceptable from the Department's perspective.	<p>The remainder of text in the EIS section describes the Proposed Action's compliance with the requirements. Appendix A, NEPA-HEPA Compliance Guide, has been added to identify the specific section in the EIS where information is provided as required by NEPA and HEPA.</p> <p>Executive Summary sentence revised to "The Army would continue to implement mitigation and management measures to address impacts from ongoing activities at PTA, and also proposes potential mitigation measures to reduce the severity of adverse impacts from the Proposed Action."</p> <p>The EIS has been revised to clarify and distinguish ongoing impacts and management measures (due to continuation of ongoing activities) and potential new impacts and mitigation measures (due to administrative action of continuing or ending ongoing activities and implementing connected actions).</p>
Lauren Yasaka	State, DLNR, Land Division	Please recheck your calculations for the Maneuver Area under Section 1.2.5.	The information provided in Section 1.2.5 has been confirmed as written and no change is warranted.
Lauren Yasaka	State, DLNR, Land Division	Section 2.1.1 lists various training area (TA) numbers without any context and the figure showing these TAs is not referenced until the end of the section. We would suggest moving the figure reference up front for more clarity.	Reference to Figure 2-1 added to the first paragraph of Section 2.1.1.
Lauren Yasaka	State, DLNR, Land Division	Under Section 3.2.4.1 where ceded lands are discussed, we suggest that you make it explicitly clear that all the State lands included in the Proposed Action are ceded lands.	Section 3.2.4.1 has been revised to note that the three westernmost parcels of State-owned land at PTA administered by DLNR is ceded land.
Lauren Yasaka	State, DLNR, Land Division	As stated in Section 3.2.4.2 Recreation, please clarify if the "funds collected from hunting activities" are used for conservation management specifically within the PTA or elsewhere. If elsewhere, please provide that information.	EIS Section 3.2.2 has been revised to reflect that funds collected from hunting activities are handled consistent with DoDI 4715.03, which states, "Hunting, fishing, and access permitting and fees, if collected, must be deposited and used pursuant to the Sikes Act, and should be used only on the installation where collected." All funds collected are used at PTA for conservation programs.
Lauren Yasaka	State, DLNR, Land Division	Under section 3.2.6.4 No Action Alternative, we note that there are no potential mitigation measures proposed even though the summary of impacts states that there would be "new, long-term moderate, adverse impacts on encroachment management." We are curious as to why the installation of fencing and signage would not also be applicable to this alternative. We also note that mitigation regarding the installation of such fencing and signage is not addressed in the DEIS. For example, fencing should not include the use of barbed wire due to the presence of the Hawaiian hoary bat at PTA.	<p>The No Action Alternative includes actions (many of which are lease compliance actions that would be triggered by lease expiration) that would mitigate environmental impacts from past and ongoing Army actions. An example from Section 2.2.4 is "Meet ongoing biological resources mitigation requirements (e.g., conservation fence units) in the State-owned land via reforestation of portions of the State-owned land or some other arrangement negotiated with USFWS and State, as applicable." The EIS has been revised to clearly identify specific measures that are part of the alternative or "included in the action plan" as HAR 11-200-2-24(p) states.</p> <p>The No Action Alternative does not include proposed Army actions so no mitigation is proposed (i.e., there are no Proposed Action impacts to mitigate); however, the Army would implement lease compliance actions and cleanup and restoration activities for any hazardous substances and hazardous wastes within the State-owned land not retained, which are considered connected actions. EIS revised to include potential mitigation measures for connected actions when applicable. EIS revised to include existing management measures for ongoing activities, connected actions, and potential mitigation measures (e.g., Army could add fence [without barbed wire due to Hawaiian hoary bat] and/or signs on U.S. Government-owned land and State-owned land retained along areas adjacent to State-owned land not retained under Alternatives 1, 2 and 3 to help prevent encroachment to U.S. Government-owned land).</p>

## Responses to Draft EIS Comments

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Lauren Yasaka	State, DLNR, Land Division		<i>(response continued from above)</i> Following the end of the lease, the Army may decide to install fencing and signs on U.S. Government-owned land to prevent encroachment, but such a potential future action is not identified as a potential mitigation measure because the Army can't propose mitigation for instances in which it takes no action (i.e., the No Action Alternative).
Lauren Yasaka	State, DLNR, Land Division	For Section 3.3 Biological Resources, we would like to see a list of all native biological resources located on the State Lands. We would also suggest using the common, local name of the species rather than the scientific name in the body of the text for ease of reading, rather than having the reader consult with the different tables.	Species names have been changed to reflect common names for wildlife and scientific names for plants.  A list of all native species known to occur on PTA, and narrowed down to State-owned land where possible, is available in Section 3.3.4.3 and 3.3.4.4.
Lauren Yasaka	State, DLNR, Land Division	Under Section 3.3.4.3, subheading Protected Invertebrates, you reference a 2005 USFWS Recovery Plan for Blackburn's Sphinx Moth ( <i>Manduca blackburni</i> ). This is a rather old plan (over 17 years old) and we would request that you confirm with USFWS that this Plan is still applicable and that the information you have provided in the DEIS is still accurate.	EIS has been revised with the most up to date USFWS information available for this species.
Lauren Yasaka	State, DLNR, Land Division	Please clarify where your assumptions came from in Section 3.3.5.	Assumptions have been revised and references to State funding have been removed throughout the EIS.
Lauren Yasaka	State, DLNR, Land Division	Please check your calculations in Section 3.4.4.3, subheading Archaeological Investigations.	Section 3.4.4.3 of the EIS has been revised to reference Figure 3-6 to depict archaeological survey coverage of the State-owned land. Text has been clarified to provide context.
Lauren Yasaka	State, DLNR, Land Division	Section 3.6.4, subheading Air Emission Sources at PTA, states that last short-term air monitoring program was done January 2006 to 2007 to determine the impact of fugitive dust from training and other activities. Please confirm that the activities conducted are still the same today as they were back in 2007 or include an updated study.	Section 3.6.4 revised to note that activities within the State-owned land have changed some since fugitive dust monitoring was conducted in 2006-2007; however, the type and quantity of activities have not significantly changed so fugitive dust generation is expected to be comparable to the 2006-2007 monitoring event. The fugitive dust monitoring was discontinued in 2007 because a year of monitoring showed the levels to be well below state and federal limits. There are no planned changes to training activities or frequency in the State-owned land.  Sections 3.6.4 and 3.6.6 revised to state PTA manages and would continue to manage fugitive dust via 1) erosion control and stabilization techniques (revegetation, erosion control structures, site hardening, dust palliatives) under the Land Rehabilitation and Maintenance component of the Integrated Training Management Program (USAG-HI & USARPAC, 2013), 2) adherence to Unified Facilities Criteria 3-250-09FA, Aggregate Surfaced Roads and Airfields Areas, which has dust control requirements for aggregate surfaced roads and airstrips of airfields at Army installations, and 3) best management practices such as maintenance of roads and training trails, maintenance of vegetative cover, periodic application of water to control dust, and modifying training during high risk conditions. Integrated Training Management Program Land Rehabilitation and Maintenance project best management practices are assessed annually during Range and Training Land Assessment reviews (U.S. Army Hawaii Range Division, 2022).
Lauren Yasaka	State, DLNR, Land Division	Section 3.7.4, subheading Noise Impacts on Community and Wildlife, states that the Ke'āmuku parcel landing and drop zones were not a part of the 2020 noise model even though the closest community is outside the northern boundaries of the Ke'āmuku parcel. Please elaborate on why that information was excluded from the 2020 noise model and please clarify if the Ke'āmuku parcel landing and drop zones could have a potential noise impact to the nearest community.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.

## Responses to Draft EIS Comments

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Lauren Yasaka	State, DLNR, Land Division	Section 3.8.4.3, subheading Erosion Management, states that there is supposed to be a Dust and Soils Management and Monitoring Plan which "includes the monitoring of actual fugitive dust levels during training" and references Section 3.6. However, this contradicts what is presented in Section 3.6 as Section 3.6.4, subheading Air Emission Sources at PTA, states that last short-term air monitoring program was done January 2006 to 2007. Please clarify this discrepancy.	<p>Sections 3.6.4 and 3.8.4.3 revised to state fugitive dust monitoring was conducted in 2006-2007 then discontinued because a year of monitoring showed the levels to be well below state and federal limits. EIS revised to remove discussion of the U.S. Army Garrison Hawaii Dust and Soils Management and Monitoring Plan as it is no longer used because fugitive dust monitoring showed the dust levels to be well below state and federal limits.</p> <p>Sections 3.6.4 and 3.6.6 revised to state PTA manages and would continue to manage fugitive dust via 1) erosion control and stabilization techniques (revegetation, erosion control structures, site hardening, dust palliatives) under the Land Rehabilitation and Maintenance component of the Integrated Training Management Program (USAG-HI &amp; USARPAC, 2013), 2) adherence to Unified Facilities Criteria 3-250-09FA, Aggregate Surfaced Roads and Airfields Areas, which has dust control requirements for aggregate surfaced roads and airstrips of airfields at Army installations, and 3) best management practices such as maintenance of roads and training trails, maintenance of vegetative cover, periodic application of water to control dust, and modifying training during high risk conditions. Integrated Training Management Program Land Rehabilitation and Maintenance project best management practices are assessed annually during Range and Training Land Assessment reviews (U.S. Army Hawaii Range Division, 2022).</p>
Lauren Yasaka	State, DLNR, Land Division	Section 5.2 should also include "Unresolved Issues" in the heading as this is specific to HEPA.	Please see previous response.
Lauren Yasaka	State, DLNR, Land Division	In Chapter 7, we note that there are specific NEPA Analysis teams as well as NEPA subject matter experts, yet there are only two contributors to the DEIS that have HEPA experience. Staff notes that expertise in HEPA requirements is essential.	Section 7 has been revised to show the contributors with HEPA experience.
Lauren Yasaka	State, DLNR, Land Division	In the Archaeological Literature Review (Appendix D), we note that while Section 3.2 specifically refers readers to Figures 14 through 18, those figures appear to have been redacted with the explanation of "Sensitive cultural resource location information withheld." While we recognize that locations of some cultural resources, such as burials, are normally withheld, most often the type of archaeological sites as listed in Table 4 are normally shown. Please provide the appropriate figures or a reasonable explanation as why that data has been withheld.	The Archaeological Literature Review (Appendix J) as been updated to show the general types and distribution of archaeological sites.

## Responses to Draft EIS Comments

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Darlene Nakamura	State, DLNR, Land Division - Hawaii District	<p>In addition to the comments submitted separately by Chairperson Suzanne Case, attached are comments from the (a) Engineering Division and (b) Land Division-Hawaii District on the subject matter. We understand the Division of Forestry and Wildlife may also submit comments separately.</p> <p>---</p> <p>Thank you for the opportunity to review and comment on the subject matter. The Land Division of the Department of Land and Natural Resources (DLNR) distributed or made available a copy of your request pertaining to the subject matter to DLNR's Divisions for their review and comments.</p> <p>In addition to comments submitted separately by Chairperson Suzanne Case, attached are responses from the (a) Engineering Division and (b) Land Division-Hawaii District on the subject matter. We understand the Division of Forestry and Wildlife may also submit comments separately. Should you have any questions, please feel free to contact Darlene Nakamura at (808) 587-0417 or email: darlene.k.nakamura@hawaii.gov.</p> <p>---</p> <p>We have no objections.</p>	<p>Thank you for DLNR Land Division - Hawaii District's review of the Draft EIS for the Army Land Retention Project at Pōhakuloa Training Area. We understand Hawaii District has no objections.</p>
Tlger Mills	State, DLNR Office of Conservation and Coastal Lands	<p>The Office of Conservation and Coastal Lands (OCCL) has reviewed the draft EIS to analyze the environmental impacts associated with potentially retaining up to approximately 23,000 acres of State-owned land at the Pōhakuloa Training Area (PTA) to support continued military training. Ongoing uses include military training; facilities; utility; and infrastructure maintenance/repair; resource management actions; associated activities such as emergency services; permit/coordinate public use programs/training for DoD, international partners, local agencies, and the community. PTA is the largest contiguous military live-fire range and maneuver training area that can accommodate up to 5000 souls.</p> <p>Conservation District</p> <p>The subject State-owned parcels lie within the Resource subzone of the Conservation District with parcel 005 also lying within the Protective, Limited, and General subzone. The purpose of the Conservation District is to conserve, protect, and preserve the important natural and cultural resource of the State through appropriate management and use to promote their long-term sustainability and the public health, safety, and welfare.</p>	<p>Thank you for reviewing the Draft EIS for the Army Land Retention Project at Pōhakuloa Training Area.</p>

## Responses to Draft EIS Comments

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Tiger Mills	State, DLNR Office of Conservation and Coastal Lands	<p>Within the draft EIS, under ES.13 Compatibility with Land Use Plans and Policies, the draft EIS states: "The State land use plans and policies include: HRS Chapter 205, State Land Use Commission, which sets rules related to the Conservation District..." Hawai'i Revised Statutes Chapter 183C entitled Conservation District sets the rules to regulate the Conservation District. Further under Section 5.3.2 State; Conservation District Rules, Hawai'i Administrative Rules Chapter 13-5 the draft EIS states : "Uses that are not listed require a discretionary permit from the BLNR. Discussion: The State-owned land at PTA lies in the Resource subzone. Military training is not included as an allowable use for any conservation district subzone. However, HAR Chapter 13-5 provides for authorization of additional uses and, therefore, allows for conformance with the rules. Section 3.2 indicates that ongoing activities have been in conformance with conservation district rules and that the Proposed Action would be as well." This is an incorrect statement. Proposed land uses in the Conservation District must be an identified land use under the Hawai'i Administrative Rules Chapter 13-5. The Department does not entertain applications for un-identified land uses. If a proposed land use is not present, an applicant can request a temporary variance [less than 1 year], petition the land use commission for a land use district boundary change, or initiate an administrative rule amendment to have the proposed use added to the identified land uses.</p>	<p>The EIS has been revised to describe current nonconforming use as well as the administrative processes required to continue military use of the State-owned land. As described in the EIS, military use during term of current lease has been authorized by the lease terms, and is considered "nonconforming" as defined in the conservation district rules, which were enacted following issuance of the lease.</p>
Tiger Mills	State, DLNR Office of Conservation and Coastal Lands	<p>Existing Uses of the State Land While some of the existing uses on the parcels may be consistent with conservation district rules such as facilities, utilities, infrastructure maintenance/repair, and resource management actions; military use that involves maneuvers, ammunition, artillery and mortar systems, depleted uranium, explosives, firing points, hazardous materials and waste, live fire, unexploded ordnance, and weapons system do not appear to be consistent with the Conservation District. The OCCL was alarmed at the number of previous dump sites on the State leased land illustrated on Figure 3-7. Under HRS §183C-4 Zoning; amendments (b) no waste or disposal facility shall be located in a conservation district except in emergency circumstances where it may be necessary to mitigate significant risks to public safety and health; "Waste or disposal facility" means any transfer station or landfill as defined in section 340A-1, open dump as defined in section 342H-1, solid waste reduction facility or waste reduction facility as defined in section 342G-1, disposal facility, or any other facility for the disposal of solid waste that is required by law to obtain a permit from the department of health. "Waste or disposal facility" excludes individual, state certified, non-industrial redemption centers.</p>	<p>Section 3.2.4 of the EIS describes that military activities on State-owned land were authorized by the 1964 lease. Conservation District rules, enacted following the lease, considers uses prior to October 1, 1964 as nonconforming. The 1964 lease has been included as Appendix F.</p> <p>The lease allows firing of "all combat weapons there from into the Designated Pohakuloa impact area." EIS Section 1.3, Purpose and Need, and Chapter 2, disclose the military use of the State-owned land. As described in EIS Section 3.2.4, military use has been authorized by the lease terms, and is considered "nonconforming" as defined in the conservation district rules, which were enacted following issuance of the lease.</p> <p>In accordance with the lease and under the provisions of existing law, the Army retains responsibility for cleanup and restoration of former training areas. After the lease expires, the Army would follow Army regulations to determine how and when the cleanup and restoration of State-owned land not retained would occur, following the CERCLA process. Within the CERCLA process, all stakeholder input is taken into account, including the public and Native Hawaiian perspective.</p> <p>As shown in EIS Section 3.8.4.3 the POTA-06 landfill was opened in 1979 and closed in October 1993 in accordance with HAR Chapter 11-58.1-17.</p> <p>As noted in Section 3.5.4.11, soldiers are required to collect casings from spent rounds, wood boxes, and other solid waste debris generated during live-fire training and return them to the ammunition holding area and ammunition supply point for recycling or disposal, as appropriate. Military personnel training at PTA follow several requirements for range operations, maintenance, and clearing including the Pohakuloa Training Area Range Operations Standard Operating Procedures (2022) and the U.S. Army Garrison, Pohakuloa (USAG-PTA) External Standard Operating Procedures (2018).</p>

## Responses to Draft EIS Comments

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Tiger Mills	State, DLNR Office of Conservation and Coastal Lands	<p>Further regarding cultural resources under alternative 1[full retention]: "There would be adverse impacts to archaeological sites including damage from subsurface excavations related to troop training (e.g., field fortifications, emplacement of obstacles), off road mounted maneuvers with tactical vehicles and other routine vehicular traffic, increased access by ground troops into the ranges, possible damage from live fire and cleanup of UXO within or adjacent to resources, and through accidental damage or vandalism. Additionally, there would be continued impacts related to ongoing limitations on access to areas used for traditional and customary practices. These adverse impacts would pertain to cultural resources that are most important to Native Hawaiian populations and would thus represent disproportionate impacts on Native Hawaiian populations."</p> <p>It appears that military training is in direct conflict of the Conservation District designation to conserve, protect, and preserve the important natural and cultural resource of the State through appropriate management and use to promote their long-term sustainability and the public health, safety, and welfare. It is inappropriate to conduct this type of warfare practice upon Conservation District land adjacent to areas designated as critical habitat for the Palila; and a recreational campground for the people of Hawai'i. It is clear the composers of the draft recognize this as Section 1.4.2 Regulatory Compliance Associated with the Proposed Actions- Hawai'i Administrative Rules Chapter 13-5 Conservation District Rules states: Military use is not included as an allowable use for any conservation district subzone.</p>	<p>We acknowledge your comment. The EIS has been refined to describe the administrative processes to use of the State-owned land following additional discussion with OCCL.</p>
Tiger Mills	State, DLNR Office of Conservation and Coastal Lands	<p>The OCCL notes that the draft EIS does not contain any provisions for restorative actions that shall be taken under alternatives 2 &amp; 3 and no action such as reforestation and the cleanup of unexploded munitions and by-products, shells, and weapons decommissioning. This information should be included in the final EIS as these restorative actions are part of the lease that governs this "real estate action." The OCCL notes it appears Table 3-24 Potential Environmental Impacts concludes that the no action alternative would provide the best benefits to the land, environment, flora and fauna, and culture of Hawai'i.</p> <p>The OCCL notes TMKs (3) 3-8-001: 013 &amp;022 belong to Hawaiian Homelands. Under the Hawaiian Homes Commission Act §206, neither the governor nor the board of land and natural resources have any power over Hawaiian homelands. The OCCL notes TMKs: (3) 7-1-004:006 and 3-8-001:001 are shaded light green indicating that the parcel or portions of the parcel are U.S. Government-owned land; the Public Land Trust Information System indicate that parcel 7-1-004:006 is owned by the State of Hawai'i with no encumbrances and parcel 3-8-001:001 has a long-term lease and is also owned by the State of Hawai'i with no perpetual easement. Please clarify this in the final EIS.</p>	<p>In accordance with the lease and under the provisions of existing law, the Army retains responsibility for cleanup and restoration of former training areas. After the lease expires, if deemed necessary, the Army would follow Army regulations to determine how and when the cleanup and restoration of State-owned land not retained would occur, following the CERCLA process.</p> <p>As an operational range, PTA is regulated by the Military Munitions Rule. After the lease expires, State-owned land not retained would no longer be under the Military Munitions Rule.</p> <p>Section 2.1 includes text regarding the Army's completion of lease compliance actions (e.g., reforestation, removing weapons and shells) for State-owned land not retained. The parameters for the lease compliance actions are subject to negotiation with the State, which cannot be done until the EIS is completed and an alternative has been selected in the Record of Decision. EIS revised to identify the Army's responsibilities under the lease and that the EIS assumes the Army would fully implement the lease compliance actions, to the extent feasible.</p> <p>The U.S. Army Corps of Engineers has not been given information demonstrating that TMKs 3-8-001:013 and 3-8-001:022 are owned by the Department of Hawaiian Home Lands. The Proposed Action has been revised to not include retention of TMKs 3-8-001:013 and 3-8-001:022. TMKs 7-1-004:006 and 3-8-001:001 were placed under Army jurisdiction as cited in Executive Order 11167; these parcels are not included in the State-owned land discussed in the EIS.</p>
Kamakana Ferreira	State, Office of Hawaiian Affairs	<p>At this time, OHA provides a recommendation to withdraw the DEIS and further comments to consider prior to re-releasing the DEIS in the future.</p>	<p>As recommended in DHHL comments, the EIS has been revised to remove the 250 acres of DHHL-administered land from Alternative 1. Consequently, the 250 acres of DHHL-administered land are no longer considered for retention by the Army in any alternative.</p>

## Responses to Draft EIS Comments

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Kamakana Ferreira	State, Office of Hawaiian Affairs	<p>OHA believes that the PTA DEIS has been done prematurely as the State of Hawai'i Department of Land and Natural Resources (DLNR) has yet to implement their 2019 court ordered management plan. The DEIS does in fact acknowledge the 2019 Ching v. Case court decision requiring the DLNR management plan and further mentions that the plan was completed in April 20, 2021. The plan includes provisions for periodic monitoring and inspection, with priority areas designated for review to ensure the State fulfills its trust duty to stay informed on the condition of State leased land. However, it is OHA's understanding that the DLNR has not yet implemented the plan or conducted any site visits. As such, OHA believes that the Army should voluntarily withdraw the DEIS and that the DLNR should advise withdrawal as well until the management plan has been reasonably implemented. It would arguably be counterintuitive to pursue a further long-term lease of these parcels without knowing the impacts incurred or whether existing lease obligations have been fulfilled.</p>	<p>Sections 3.2.4 and 3.5.4 revised to state that DLNR has implemented the Court Ordered Management Plan and site visits are occurring. Army has received no corrective actions from the site visits. Consequently, Army is not going to withdraw the Draft EIS due to the Court Ordered Management Plan.</p>
Kamakana Ferreira	State, Office of Hawaiian Affairs	<p>As noted in the 2019 Ching v. Case ruling, plaintiffs argued that the State's public trust duties requires that the State reasonably monitor and investigate existing use of State lands to determine if the United States is in compliance or not with existing lease conditions. The court thus held that an essential component of the State's duty to protect and preserve trust land is an obligation to reasonably monitor a third party's use of the property, and that this duty exists independent of whether the third party has in fact violated the terms of any agreement governing its use of the land. To hold otherwise would permit the State to ignore the risk of impending damage to the land, leaving trust beneficiaries powerless to prevent irreparable harm before it occurs. Lest the condition of these lands be independently determined by the State, the State should not re-new another long-term lease at this time or entertain a process seeking renewal. Ignoring this obligation would show a disregard for the State's trust responsibilities. Further, the management plan has the potential to better inform the Army and allows adjustments to be made to planning efforts (and the DEIS itself) should deficiencies be found during inspections. OHA indeed concurs with the recommendations of the court ordered DLNR management plan for PTA lands, a copy of which is attached to this letter together with the Ching v. Case Hawai'i Supreme Court ruling as Enclosure 1.</p>	<p>Sections 3.2.4 and 3.5.4 revised to state that DLNR has implemented the Court Ordered Management Plan and site visits are occurring. Army has received no corrective actions from the site visits.</p>
Kamakana Ferreira	State, Office of Hawaiian Affairs	<p>Notably, a cultural monitoring program has been in place at PTA as part of Section III.E of the Stryker Brigade Combat Team 2004 Programmatic Agreement (PA) executed pursuant to the National Historic Preservation Act (NHPA) Section 106 process. Cultural monitor daily reports note a continued concern for the delicate PTA landscape and the possibility that it could be lost forever if not attended to. Recommendations were subsequently made to restore the traditional landscape and all life within it through: 1) protection of trees, insects, and birds; 2) compassionate eradication of ungulates; 3) expansion of native plant and forest recovery efforts; 4) preservation of the ?auwai akua (waterways of the gods); 5) securing funds for PA implementation; 6) protection of Na Pu'u (cinder cones); and 7) clean up of the PTA impact area.</p>	<p>USAG-PTA staff and cooperators continue to protect and monitor sites as related to training activities and in compliance with the National Historic Preservation Act Section 106 Programmatic Agreement, described in EIS Section 3.4. The 2004 Stryker Brigade Programmatic Agreement that included cultural monitoring has been superseded by the 2018 Hawaii Island Training Programmatic Agreement for training.</p> <p>See Section 3.3 and 3.4 for details on Army conservation programs.</p>
Kamakana Ferreira	State, Office of Hawaiian Affairs	<p>The Army has utilized PTA for nearly 65 years, with a constant barrage of military trainings (inclusive of live-fire trainings) that have riddled the trust lands with unexploded ordinances (UXOs) and endangered the many natural and cultural resources in and around the area. Further, OHA has been excluded from discussions regarding the lease renewal and implementation of the DLNR management plan. This is unacceptable as HRS 10-1(b) specifically indicates that it shall be the duty and responsibility of all state departments and instrumentalities of state government to actively work towards the goals of Chapter 10 and to assist the OHA wherever possible.</p>	<p>Land retention negotiations have not been initiated nor will they until the NEPA/HEPA process is complete.</p> <p>The Army only accommodates the requisite site visits at PTA as requested by DLNR as part of the Court Ordered Management Plan.</p> <p>Munitions and explosives of concern are addressed in Section 3.5 of the EIS. Impacts of training on natural and cultural resources are in Sections 3.3 and 3.4 of the EIS.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Kamakana Ferreira	State, Office of Hawaiian Affairs	<p>The Department of Hawaiian Homelands (DHHL), commented on the EIS Preparation Notice (EISPN) expressing concern over hazardous materials occurring near their lands and water sources as a result of military use. As such, DHHL recommended water table and air quality testing on neighboring parcels. OHA supports and shares these same concerns as DHHL as care of these lands and water resources are indeed a public trust responsibility. Again, unless the DLNR can reasonably implement their court ordered management plan, it would appear to OHA that the DEIS is drafted in a way that is rushed and does not allow for the opportunity to address any forthcoming State concerns. Withdrawal of the DEIS by the Army should be the preferred action at this time.</p>	<p>Groundwater and surface water quality are discussed in Section 3.9. Section 3.5.4.12 notes that the Army completed a 1-year airborne uranium monitoring program in 2009 to determine if depleted uranium has impacted local air quality. Total airborne uranium levels collected from 210 air samples at PTA were within the range of naturally occurring uranium in Hawaiian soils and rock and were several orders of magnitude below the U.S. and international chemical and radiological health guidelines; therefore, the depleted uranium has not impacted local air quality.</p> <p>Sections 3.2.4 and 3.5.4 revised to state that DLNR has implemented the Court Ordered Management Plan and site visits are occurring. Army has received no corrective actions from the site visits.</p>
Kamakana Ferreira	State, Office of Hawaiian Affairs	<p>Aside from the preferred alternative of full lease area retention and a no action alternative, Alternative 2 proposes a modified retention (19,700 acres) and Alternative 3 proposes minimum retention (10,000 acres and 11 miles of select roads and trails for access). There is no alternative proposing a shorter lease term. It is unclear to OHA why a shorter term is not even suggested given the fact that the DLNR management plan has not been implemented yet and compliance with existing lease conditions are unknown. Assuming a re-release of the DEIS at a later time, a meaningful analysis of alternatives that include shorter lease terms should be considered as constant renewal of a long-term lease also creates the appearance of de facto ownership. Preferably, the discussion of shorter lease terms should occur in advance of drafting the DEIS with the DLNR and OHA following implementation of the DLNR management plan.</p>	<p>The Proposed Action does not include land retention duration because that would be negotiated with the State following completion of the EIS. Section 2.2.5 includes Alternative 6 as a short-term retention alternative and the reasons it was dismissed from detailed analysis.</p> <p>Land retention negotiations have not been initiated nor will they until the NEPA/HEPA process is complete.</p> <p>Sections 3.2.4 and 3.5.4 revised to state that DLNR has implemented the Court Ordered Management Plan and site visits are occurring. Army has received no corrective actions from the site visits.</p>
Kamakana Ferreira	State, Office of Hawaiian Affairs	<p>OHA believes that consultation with the DLNR's Office of Conservation and Coastal Lands (OCCL) should already be occurring to determine specifically what type of "discretionary permits" are needed to enable the PTA lease extension. Hawai'i Administrative Rules (HAR) 13-5-24 indicates that if a proposed use is not present in the rules, then the applicant may "request a temporary variance, petition the land use commission for a land use district boundary change, or initiate an administrative rule change to have the proposed use added." The only feasible option in this case appears to be a petition for a land use district boundary change as a temporary variance for a 65-year activity would not be a temporary use, nor would an administrative change likely be proposed to include allowable live-fire training in any conservation subzone.</p>	<p>EIS Section 1.4.2 has been refined to describe the administrative processes to use of the State-owned land following additional discussion with OCCL.</p>
Kamakana Ferreira	State, Office of Hawaiian Affairs	<p>However, given that the Land Use Commission must evaluate impacts to State concerns (i.e., preservation or maintenance of important natural systems or habitats; maintenance of valued cultural, historical or natural resources), amending the conservation zoning would seem inappropriate and pursued only to accommodate the Army's continued destruction of this resource subzone. OHA cannot support this possibility as the preferred course of action as it has the potential to foreclose eligibility of the PTA as a conservation district. Considering these concerns and the uncertainty on how exactly conservation district use compliance will be demonstrated, OHA recommends that any future DEIS include a full discussion on how the Army intends to obtain conservation district compliance and to include any recommendations from OCCL.</p>	<p>The EIS has been refined to describe the pathways to use of the State-owned land, and has been revised to list the standard operating procedures (SOPs), best management practices (BMPs), and regulatory requirements the Army follows during training to protect the natural and cultural resources of the State-owned land.</p> <p>Over the past 10 years, the Army has spent \$75 million for natural and cultural resource management across its training areas on O'ahu and Hawai'i island. The Army has spent at least \$3M annually for natural and cultural resource management at PTA.</p>

## Responses to Draft EIS Comments

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Kamakana Ferreira	State, Office of Hawaiian Affairs	<p>The DEIS indicates that HRS 6E will follow the EIS process as the current HARs do not allow for State Historic Preservation Division (SHPD) review of an EIS. While OHA does recognize that the HRS 6E and 343 processes are separate, we have been supportive of the HRS 6E process being completed or at least initiated first to assist in properly informing the environmental review process. The intent of HRS Chapter 343 is to ensure a project's impact to the environment is fully considered in the planning process and to integrate mitigation where needed to minimize significant environmental harm. Surveys are conducted to identify various environmental components (i.e., flora, fauna, historic properties) so that any adverse impacts from the proposed action can be evaluated. In determining whether historic properties will be adversely impacted, the HRS 6E review process is essential to identifying historic sites and generating mitigation commitments in consultation with the DLNR SHPD. Any identified sites and resulting mitigations made during the HRS 6E review process are typically included in the environmental review for an adverse impact analysis and public comment.</p>	<p>The Proposed Action is an administrative action; no new activities are proposed. The EIS relies on existing studies to characterize existing conditions; the full summary of studies are described in the Archaeological Literature Review (Appendix J).</p> <p>Section 3.4.4 of the EIS documents the NHPA consultation process that resulted in a 2018 programmatic agreement (PA) to resolve adverse effects at PTA from ongoing activities. The PA was developed and signed by the U.S. Army, the Hawaii State Historic Preservation Officer, and the Advisory Council on Historic Preservation.</p> <p>As noted in Section 3.4.2 of the EIS, HRS Chapter 6E may be undertaken separately from the EIS process.</p>
Kamakana Ferreira	State, Office of Hawaiian Affairs	<p>HAR 11-200.1-18(d)(7) and (8) requires that impacts be identified and proposed mitigations be included within an environmental assessment. If HRS 6E is conducted after the HRS 343 process, impacts to historic and cultural resources cannot be identified as the means to identify these environmental components are not yet completed. Furthermore, since mitigation for any adverse effects to historic properties and cultural resources are made as a result of consultation with SHPD through the HRS 6E process, proposed State level mitigations cannot be included in environmental review documents if HRS 6E is not completed. OHA thus questions the completeness of any environmental review for projects that have not yet undergone HRS 6E review.</p>	<p>The Proposed Action is an administrative action; no new activities are proposed. The EIS relies on existing studies to characterize existing conditions; the full summary of studies are described in the Archaeological Literature Review (Appendix J).</p> <p>Section 3.4.4 of the EIS documents the NHPA consultation process that resulted in a 2018 programmatic agreement (PA) to resolve adverse effects at PTA from ongoing activities. The PA was developed and signed by the U.S. Army, the Hawaii State Historic Preservation Officer, and the Advisory Council on Historic Preservation.</p> <p>As noted in Section 3.4.2 of the EIS, HRS Chapter 6E may be undertaken separately from the EIS process.</p>
Kamakana Ferreira	State, Office of Hawaiian Affairs	<p>As one of the key pillars of HRS 343 is to allow for public comment on a proposed action, deferring the HRS 6E review process to take place after HRS 343 review could hide the presence of historic properties and cultural resources that are important to Native Hawaiians from our beneficiaries and the general public. As the opportunity to include possible adverse impacts and mitigations in an environmental review are now foreclosed, our beneficiaries would not be fully informed on the proposed action when environmental review documents are specifically provided for comment.</p>	<p>EIS Sections 3.3 and 3.4 have been expanded to include relevant information from the many documents that guide the Army's actions to minimize impacts to cultural and natural resources.</p>
Kamakana Ferreira	State, Office of Hawaiian Affairs	<p>OHA does recognize that ongoing Federal level NHPA Section 106 commitments and an existing PA is in place for PTA. However, the state historic preservation review process is still important as a significance criteria for sites important to Native Hawaiians is present that does not exist on the Federal level. The DEIS does in fact recognize that the HRS 6E process for the State includes site significance under Criterion E for their importance to Native Hawaiians. The EIS further suggests that the cultural impact assessment (CIA) process can be used to inform this determination to calm concerns regarding the lack of HRS 6E initiation.</p>	<p>Section 3.4 of the EIS summarizes the findings of more than 30 archaeological surveys (see Appendix J, Archaeological Literature Review) and presents the findings of the associated Cultural Impact Assessment (Appendix I) for the region including the State-owned land leased by the Army.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Kamakana Ferreira	State, Office of Hawaiian Affairs	While the CIA process can help inform the assessment of Criterion E sites, the process should not supplant the actual assessment of Criterion E sites by a qualified archaeologist during the HRS 6E process or be used to possibly mislead people into thinking that the CIA identification process is enough to identify Criterion E sites for sake of the HRS 343 process. In many other cases, the HRS 6E process does not even require a CIA as not all project actions are subject to HRS 343. Thus, for many years, Criterion E site evaluations appear to have been mostly done through the HRS 6E process without any influence from a CIA document. OHA has not seen an attempt to possibly supplant Criterion E evaluation prior to the release of this PTA DEIS. OHA stands by our position that the HRS 6E process should be initiated and that the site identification process be completed first to adequately inform the DEIS.	The Record of Decision will document Army requirements for compliance with HRS Chapter 6E as determined by the land retention method.
Kamakana Ferreira	State, Office of Hawaiian Affairs	A CIA was completed for this project in October 2021 as part of the DEIS document. In review of the methodology, it appears that community outreach efforts started with requests for survey participation that ran in OHA's Ka Wai Ola in October 2020 and November 2020. 62 responses were received representing 39% of those who were contacted. It further appears that only a single person was interviewed and email responses were received from 4 individuals. Given that the CIA surveys and outreach effort were conducted at the early onset of the COVID-19 pandemic, OHA believes that another round of consultation should be carried out as people may not have had enough time to comment or were experiencing personal hardships. OHA does further recognize that many other projects in areas of concern or cultural sensitivity have opted to include several rounds of consultation for CIAs. For example, the decommissioning of the California Institute of Technology telescope atop Maunakea included an initial consultation in 2018 for a CIA; but, they opted for a longer consultation process that ran again in 2020 at the request of cultural practitioners and the known cultural concerns surrounding Maunakea. In this particular case, OHA strongly recommends an additional round of consultation for the CIA, with an emphasis on ascertaining additional interviewees and responses.	Section 3.4.4.4 of the EIS and Sections 5.0 and 6.0 of the CIA have been revised to reflect additional information provided by interviewees who responded to a second request for input in December, 2022, following the height of the COVID-19 pandemic.
Kamakana Ferreira	State, Office of Hawaiian Affairs	Mahalo for the opportunity to comment. OHA looks forward to seeing the DEIS withdrawn, implementation of the DLNR management plan, and integration of our further comments into a future re-release of the DEIS. Given OHA's responsibility to our beneficiaries and the public land trust, we further insist that OHA be included in future discussions regarding implementation of the DLNR management plan and any consideration of lease renewal and alternatives.	Thank you for your comment. The EIS has been prepared under NEPA and HEPA regulations to disclose the Army's Proposed Action to retain the land. The EIS has been revised for each relevant resource section in Chapter 3 and Appendix E to document that the Court-Ordered Management Plan is considered in all ongoing Army activities.
Kamakana Ferreira	State, Office of Hawaiian Affairs	Further, it should go without saying that the public's general trust with the military's ability to properly steward Hawai'i lands and resources have been shaken in light of the recent Red Hill water crisis and past occurrences of strewn unexploded ordinances on State lands (i.e., Kahoolawe, Makua Valley). As such, the military should make every effort to meaningfully consult with the State (i.e., DLNR, OHA) and the Native Hawaiian people, proactively plan, cooperate with inspections that are part of the Court ordered DLNR management plan, and comply with any corrective actions that may be recommended following the DLNR's management plan inspections.	Your comment is noted. Please refer to the earlier response documenting that the Army has received no corrective actions from DLNR site visits conducted to date.

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Kamakana Ferreira	State, Office of Hawaiian Affairs	OHA strongly recommends that the Department of Defense (DoD) begin consultation with Native Hawaiian organizations (NHOs) pursuant to the DoD Instruction, No. 4710.03 and ACHP's Consultation with Native Hawaiians in the Section 106 Review Process, A Handbook (attached hereto as Enclosures 2 and 3, respectively), setting forth mandated policy and procedures for consultation with NHOs when proposing an undertaking that may affect a property or place of traditional religious and/or cultural importance, or action that may affect a long term or permanent change in NHO access to a property or place of traditional religious and cultural importance to an NHO in addition to consultation in compliance with NEPA and NHPA. OHA may also serve to facilitate effective consultation between NHOs and DoD Components, with the understanding that no single NHO is likely to represent the interests of all NHOs or the Native Hawaiian people. See also United Nations Declaration of the Rights of Indigenous Peoples, attached as Enclosure 4, which further promotes consultation between respective States and indigenous peoples.	This EIS has been prepared under NEPA (42 U.S.C. Section 4321 <i>et seq.</i> ) and Hawaii Environmental Impact Statement statute and rules (HRS Chapter 343 and HAR Chapter 11-200.1). Army compliance with NHPA Section 106 for DoD activities at PTA is described in EIS Section 3.4.
	Hawaii County, Department of Water Supply	We have reviewed the subject Draft Environmental Impact Statement and have no further comments at this time. Should there be any questions, please contact Mr. Ryan Quitoriano of our Water Resources and Planning Branch at (808) 961-8070, extension 256.	Thank you for your review. We understand that the Hawai'i County Department of Water Supply has no further comments at this time.
Clinton Baybayan	Hawaii Fire Department	In regards to the this project, it will need to have the proper infrastructure for Fire Department access and water supply for firefighting that meets the requirements of the Hawaii State Fire Code and the Hawaii County Code.	The Proposed Action is an administrative action and no construction is proposed.
Zendo Kern, Planning Director	Hawaii County, Planning Department	Thank you for including us in the review of Army Training Land Retention at Pōhakuloa Training Area (PTA), Draft Environmental Impact Statement (EIS). We understand the United States Army has initiated the EIS process under the National Environmental Policy Act (NEPA), guided by the Council on Environmental Quality NEPA, implementing regulations in Title 40 Code of Federal Regulations (C.F.R.) Parts 1500–1508, and Army NEPA implementing regulations in Title 32 C.F.R. Part 651. The EIS has also been initiated under Hawai'i Revised Statutes (HRS) Chapter 343 and Hawai'i Administrative Rules Chapter 11-200.1 (HEPA). The County of Hawai'i has little to no jurisdiction over these subject lands. During the scoping period, the Planning Department transmitted a pre-consult letter dated October 12, 2020, which included a list of relevant stakeholders to be consulted with and a request for this EIS to be heard by the County's Cultural Resource Commission (CRC). We reiterate those requests herein. If you have any question regarding this letter, please feel free to contact me at (808) 961-8125 or via email at zendo.kern@hawaiiicounty.gov.	Thank you for your comment.

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Kurt Fevella	Senator Kurt Fevella, State of Hawaii, District 19	<p>I am writing to oppose the Army's proposal to retain for continued military training up to 23,000 acres of State-owned land at the Pohakuloa Training Area (Pohakuloa) situated between the peaks of Mauna Loa and Mauna Kea on Hawaii Island. The U.S. military began using lands at Pohakuloa in the early 1940s during World War II as an artillery live-fire training area. This was followed by the Governor of the Territory of Hawaii issuing an Executive Order in 1956 for use of 758 acres. And finally, the present lease between the State of Hawaii and the U.S. Government of the 23,000 acres began in 1964 and is set to expire on August 16, 2029. This means lands at Pohakuloa first under the Territory of Hawaii and now the State of Hawaii have been used by the military for nearly eight (8) decades. The U.S. military control cannot continue indefinitely and the time has come to return these public lands at Pohakuloa to the State of Hawaii. The Army reports that there is no other training area besides Pohakuloa in Hawaii that can accommodate collective training, yet the military already has jurisdiction over nearly 110,000 acres of adjacent U.S. federal government-owned lands for military training. And while I recognize the need to protect the United States' efforts to use these islands for various military training, we also need to consider the health and safety of our people, land, air, and water quality that has continuously been negatively impacted by military training. The historical training activity by the military on State lands continues to have long-lasting negative effects on the historical value of these Hawaiian Islands.</p>	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Kurt Fevella	Senator Kurt Fevella, State of Hawaii, District 19	<p>The history of Kaho'olawe since the start of the U.S. Navy bomb training in 1953, set the precedence of a continuous historical trauma between the Kānaka Maoli (original inhabitants), the people of the State and the military's use of State's lands. As a result of Protect Kaho'olawe 'Ohana actions and litigation, President George Bush, Sr. ordered a stop to the bombing of Kaho'olawe in 1990. Kaho'olawe was then turned over to the State of Hawai'i Kaho'olawe Island Reserve Commission in 1994. Huge efforts and sums of monies were given to remove, clear and restore the lands back to its original state, and these efforts continue today.</p> <p>The damage that was endured on Kaho'olawe sets a standard on what is to be expected in the future should the military continue its present use which will result in further desecration and impact to these islands. Kaho'olawe is only one prime example. There are also other harmful desecrations that have occurred on Oahu lands including the Kahuku Training Area, Kawaiiloa-Poamoho and Makua Military Reservation. The military must now redirect its efforts to cultivate these lands back to its original natural state. It is in the best interest of the Kānaka Maoli, the community and the State of Hawai'i that these lands are given back to the people to steward these ancestral lands.</p>	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Kurt Fevella	Senator Kurt Fevella, State of Hawaii, District 19	<p>It would be detrimental for Native Hawaiians, like myself, to stand idly by and relinquish claims to public lands (aka government and crown lands), which we believe were taken without consent or proper compensation. I firmly believe the U.S. Government must return the State-owned lands at Pohakuloa Training Area and provide the necessary funding for protection and restoration projects. Thank you for your consideration of my testimony.</p>	Thank you for your comment. Land tenure is discussed in Section 3.2.4 of the EIS.

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Kurt Fevella	Senator Kurt Fevella, State of Hawaii, District 19	Aloha, this is Senator Kurt Fevella, LOV (ph.) Station 19. I'm in opposition to Pohakuloa training EIS. We need to restore Pohakuloa to its natural beauty, because it's very vital to the people of Hawaii that we change it back into its natural order. It's between two beautiful sacred mountains of Mauna Loa and Mauna Kea. We need to take care of our aina and to give it back to the people of Hawaii. Thank you for your time. Again, I'm opposing the EIS for Pohakuloa Training. Thank you for your time. Take care and God bless.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Jason Chung	Chamber of Commerce Hawaii's Military Affairs Council (MAC)	The Military Affairs Council of the Chamber of Commerce Hawaii supports the retention of state-owned lands to be able to continue critical training of the Army, Marines and Hawaii National Guard. These lands have been used for training since 1956 and continue to be important to ensure that when we put our brave warriors in harm's way, they are prepared to execute their missions and return home safely to their families. As many have said before, freedom is not free. And the more our troops can be ready and trained, the greater the likelihood they return home with less injuries or loss of life. The MAC continues to work and engage in community conversations about the importance of the Army being a good environmental steward of the training lands, to include cleaning up of unexplored ordnance to allow for the greater use and enjoyment of the surrounding lands. It also includes partnerships with Native Hawaiian cultural practitioners to assure regular access to cultural sites, and to begin a discussion about what co-management of the lands could look like. Lastly, let's commit to being creative on economic opportunities for Hawaii Island business and young people. The MAC encourages the Army to continue to actively engage with the community and stakeholders to address concerns raised in the draft EIS. MAC stands ready to assist. The retention of these lands is good for our nation, and the state of Hawaii.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Brian Ley	County GMAC	Aloha Brian Ley, County GMAC. (Game Management Advisory Council) If PTA continues with its lease. We highly recommend that it installs and repairs excising waters for the animals entrusted to its care. the lack of water for the game animals is not a state mandate according to Hawaii West Biologist Kanalu Sproat. there is no reason for the environmental damage being caused because these animals are dying of thirst. Watching the damage and suffering going on in PTA is very disturbing. The bird hunting has gone from highly exceptional to almost nonexistence, in a few short years. habitat management and control burns would be greatly appreciated	We note your comment that game animals should be provided water. See EIS Section 3.2.4 related to Army best management practices for habitat management and Section 3.16.4 for prescribed burn information.
Melodie Aduja	Environmental Caucus of the Democratic Party of Hawaii	1. If the lease is to be renewed, that the "rental rate" be a serious amount, and not a neo-colonial one-dollar for sixty-five more years, and that the Military must in any event pay arrearages for past grossly insufficient rent; 2. The DOD must undertake SERIOUS environmental clean-up; and	Land retention negotiations, including compensation for use of the land, would be initiated following completion of the NEPA/HEPA process.  In accordance with the lease and under the provisions of existing law, the Army retains responsibility for cleanup and restoration of former training areas. After the lease expires, if deemed necessary, the Army would follow Army regulations to determine how and when the cleanup and restoration of State-owned land not retained would occur, following the CERCLA process.

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Melodie Aduja	Environmental Caucus of the Democratic Party of Hawaii	<p>3. The DOD must undertake and abide by serious plans for the return of portions of the PTA over the course of a reasonable period of time, with eventual closure. The Democratic Party of Hawaii (DPH) has an enrolled membership of some 145,000 active and associate members in the State of Hawaii. The Environmental Caucus of the Democratic Party is a semi-autonomous organization of over 5,330 DPH members. We advocate to advance the Party's environmental Platform planks and Resolutions, including those adopted by DPH members at the Democratic State Convention in 2018 that are quoted below. Fundamentally, we object to the renewal of the lease of 22,971 acres of stolen, ceded State lands (Hawaii Revised Statutes ("HRS") §343-5(a)(1)) in a Conservation District (HRS §343-5(a)(2)) and county Forest Reserve that was entered into between the Army and the State of Hawaii in 1964 in consideration of \$1.00 for a 65-year lease to expire in 2029. For multiple reasons summarized here, we object to the continuation of the lease and the continued failure of the Army to adequately clean up the site. We reluctantly use the draft EIS process as an inadequate means of redress to express our concerns, as permitted under the National Environmental Policy Act ("NEPA").</p>	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Melodie Aduja	Environmental Caucus of the Democratic Party of Hawaii	<p>The reasons for this opposition are simple: the U.S. Military has historically and systematically abused and degraded the environment and has not been environmentally sound in its clean-up and restoration. There are more than 40,000 hazardous sites across the country polluted by U.S. military operations, affecting a total amount of land larger than the entire state of Florida. Many of these sites have extensive groundwater and soil pollution, or present a risk of exploding bombs and munitions, even if they are open to the public. Some have been converted to parks and wildlife reserves and even housing developments. Many sites were part of old defense facilities that have long since shut down, and may not be known locally, even though a risk of exposure to contaminants may still be present. Even sites where the DOD says it has already completed its response can present an ongoing threat or risk to the public. While the data pinpoint a precise location, contamination from that location may well affect a much larger area, including public and private lands and the water supplies beneath them. <a href="https://www.propublica.org/article/reporting-recipe-bombs-in-your-backyard">https://www.propublica.org/article/reporting-recipe-bombs-in-your-backyard</a></p>	Thank you for sharing your concerns. In accordance with the lease, and under the provisions of existing law, the Army retains responsibility for cleanup and restoration of former training areas. After the lease expires, the Army will follow Army regulations to determine how and when the cleanup and restoration will occur, following the CERCLA process.
Melodie Aduja	Environmental Caucus of the Democratic Party of Hawaii	<p>There are at least 25 hazardous sites at the PTA. Many of these sites have been declared "clean" by the DOD but are still not safe for use by people. This military installation is safe only with the following conditions in place: fences, signs, local use ordinances, prohibit or otherwise manage excavation, prohibit residential use, landfill restriction, prohibit activities that would impact the landfill cap (or cover system), and drainage system, landfill restriction - prohibit excavation on landfill cap or cover system, landfill restriction - restrict access to the site. Currently, the PTA has one HIGH RISK active site where cleanup remains ongoing. The Pu'u Pa'a site is of high risk and is subject to the removal of unexploded munitions and ordnance at an estimated cost of \$90 million plus expected future cost of cleanup and an expected final cleanup action to occur in November 2045. The high risk assessment is made by the DOD which prioritizes the cleanup of sites that pose greatest threat to safety, human health, and the environment. A second site subject to removal of unexploded munitions and ordnance is located at the former Bazooka Range. Its cleanup cost in 2015 plus future cost of cleanup was expected to be \$1.7 million with a final cleanup action in June 2017.</p>	<p>Section 3.5.4.11 provides information regarding the 2015 cleanup of MEC and lack of chemicals of concern at the PTA Former Bazooka Range, which includes the High Mortar Concentration Area. Text revised with MEC and debris quantities from the Final Site Specific Final Report, Removal Action, Pohakuloa Training Area Former Bazooka Range, Island of Hawaii (February 2016).</p> <p>There are currently land use controls and long-term monitoring actions in place for the landfills that will remain in place even if the land is transferred back to the state. Sections 3.5.6.4, 3.8.6.4, and 3.15.6.4 revised to State the Army would maintain ongoing management of the POTA-06 former landfill on State-owned land if the No Action Alternative is selected, pending an agreement allowing the Army access for necessary inspection and management. When the lease expires, maintenance of the landfill and land use controls may be negotiated in the transfer of the property.</p> <p>The Pu'u Pa'a site is not on PTA and is outside the scope of the EIS.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Melodie Aduja	Environmental Caucus of the Democratic Party of Hawaii	<p>Given the U.S. Military's use of hazardous substances, explosives and ordnance necessitating numerous cleanups leaving the land with restricted or no access available, it appears that the purpose of NEPA cannot be accomplished by the continuation of military training at P?hakuloa as the land can never be restored and enjoyed even after thirty years of cleanup. PTA is not the only site of subject to hazardous substances, explosives and ordnances necessitating numerous cleanups. In fact, there are 115 Military Installations with hazardous sites in the State of Hawai'i with a total past and future cleanup cost of \$2.77B and of the 115 Military Installations, 43 are determined by the DOD to be HIGH and MEDIUM hazardous risk Installations. See, chart <a href="https://projects.propublica.org/bombs/installation/HI9214522234002100#b=15.512459942662547,174.06437,31.555618072891495,-147.263755&amp;c=shrink">https://projects.propublica.org/bombs/installation/HI9214522234002100#b=15.512459942662547,174.06437,31.555618072891495,-147.263755&amp;c=shrink</a></p>	<p>Thank you for your comment. In accordance with the lease, and under the provisions of existing law, the Army retains responsibility for cleanup and restoration of former training areas. After the lease expires, the Army will follow Army regulations to determine how and when the cleanup and restoration will occur, following the CERCLA process.</p>
Melodie Aduja	Environmental Caucus of the Democratic Party of Hawaii	<p>To this very long list, we must now add the Red Hill Underground Fuel Storage Facility on O?ahu. It is now well known that the Red Hill facility is an imminent danger to the fresh water sole source aquifer of the entire Island of O?ahu, where 65 percent of Hawai'i's population resides, and where huge military facilities are located. The Department of Defense has now recognized that the facility needs to be shut down as soon as possible at the probable cost of two or three billion Dollars because of 80 years of corrosion, disrepair, and lack of adequate testing and maintenance of the Facility and its pipelines, that it absolutely cannot be properly and safely operated. The point of providing this listing is to demonstrate the absolutely terrible record of the U.S. military in exercising its stewardship responsibilities as a user of lands in Hawai', regardless of whether these are open lands like P?hakuloa, or complex operational facilities like Red Hill. Given the multitude of Military Installations throughout the State of Hawai'i that remain high and medium risk of injury and contamination, the Environmental Caucus remains steadfast in its opposition to the proposed retention of the PTA for the continuation of uninterrupted military training pursuant to NEPA, Article XI, Section 1 of the Hawai'i State Constitution; the Precautionary Principle; and Ching v. Case, 145 Hawai'i 148, 449 P.3d 1146 (2019).</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Melodie Aduja	Environmental Caucus of the Democratic Party of Hawaii	<p>The Hawai'i State Constitution, Article XI, Section 1, states: For the benefit of present and future generations, the State and its political subdivisions shall conserve and protect Hawai'i's natural beauty and all natural resources, including land, water, air, minerals, and energy sources, and shall promote the development and utilization of these resources in a manner consistent with their conservation and in furtherance of the self-sufficiency of the State. All public natural resources are held in trust by the State for the benefit of the people. The Hawai'i Supreme Court has declared in Ching v. Case that this section makes the Public Trust Doctrine ("PTD") a fundamental element of Constitutional law in the State of Hawai'i. Specifically, under Article XI, Section 1, of the Hawai'i State Constitution, the State has an obligation to protect, control, and regulate the use of Hawai'i's water resources for the benefit of its people. The Hawai'i Supreme Court has declared that this Constitutional provision creates a duty for the State to protect public trust purposes. The Public Trust Doctrine therefore seeks to protect the following Public Trust purposes:</p>	<p>The Ching v. Case lawsuit is disclosed in EIS Section 3.2.4. The Army was not party to the lawsuit.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Melodie Aduja	Environmental Caucus of the Democratic Party of Hawaii	<p>1. Domestic water use of the general public, particularly drinking water, 2. The exercise of Native Hawaiian and traditional and customary rights including appurtenant rights, 3. Reservations of water for Hawaiian Home Land allotments, and 4. Maintenance of waters in their natural state. (Water Resource Protection Plan (2008), Commission on Water Resource Management). Both the Hawai'i Supreme Court and the Commission on Water Resource Management have declared that the Public Trust Doctrine applies equally to groundwater and surface water. The Precautionary Principle is a duty under the Public Trust Doctrine. The PTD is a preventive doctrine, not a remedial one, as the Hawai'i Supreme Court recognized when it found that the Precautionary Principle was an inherent attribute of the PTD. In endorsing the Precautionary Principle, the Hawai'i Supreme Court rejected the requirement of scientific certainty before acting to protect Public Trust Purposes, noting that to do so will often allow for only reactive, not preventive regulation.</p>	Your comment is acknowledged.
Melodie Aduja	Environmental Caucus of the Democratic Party of Hawaii	<p>For these reasons, the Environmental Caucus of the Democratic Party of Hawai'i opposes the renewal of the 65-year lease for PTA between the U.S. Army and DLNR. In this light, the Environmental Caucus rejects the process involved in developing a draft EIS for the U.S. Army. Further, given that the U.S. Army – Hawai'i ("USARHAW") is retaining the U.S. Army Corps of Engineers, Honolulu District under contract W9128A19D0004 to process the EIS, we urge the U.S. Army to retain a disinterested third-party to conduct an Environmental Impact Statement before it proceeds to negotiate for the retention of the PTA.</p>	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Melodie Aduja	Environmental Caucus of the Democratic Party of Hawaii	<p>However, the Army Training Land Retention area at PTA is not in compliance with the National Environmental Policy Act of 1969 ("NEPA"), 42 U.S.C. § 4321. The purpose of NEPA is to declare a national policy that will encourage productive and enjoyable harmony between man and his environment; to promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man; to enrich the understanding of the ecological systems and natural resources important to the Nation; and to establish a Council on Environmental Quality. Clearly, the continuous act of maintaining (1) live-fire and non-live-fire artillery firing points; (2) ranges for mounted, dismounted, and aviation training; and (3) support facilities, including ammunition storage areas and helicopter and tilt-rotor aircraft landing zones fails to encourage productive and enjoyable harmony between man and his environment as the environment suffers irreparable harm; fails to promote efforts that prevents or eliminates damage to the environment and biosphere as the target areas remain littered with spent munitions and fragments and unexploded ordnance, contaminated with depleted uranium which fails to stimulate the health and welfare of man; and it fails to enrich the understanding of the rare ecological systems and natural resources and wildlife important to the Nation.</p>	<p>We acknowledge your opinion regarding compliance with NEPA.</p> <p>Additional language within the NEPA regulation requires federal agencies to examine the potential environmental effects of their proposed actions on the human environment. The NEPA process ensures that environmental information is available to public officials and citizens for review and input before decisions are made and before actions are taken.</p> <p>The U.S. Army has prepared this EIS pursuant to the National Environmental Policy Act of 1969 (NEPA) (42 United States Code [U.S.C.] Section 4321 et seq.), Hawai'i Revised Statutes (HRS) Chapter 343, and Hawai'i Administrative Rules (HAR) Chapter 11-200.1. It is a disclosure document to provide the public an opportunity to review and comment the Army's Proposed Action.</p>
Melodie Aduja	Environmental Caucus of the Democratic Party of Hawaii	<p>We believe that a comprehensive and objective analysis of U.S. military activities at Pōhakuloa pursuant to these 14 enumerated factors must lead inexorably to the conclusion that the military needs to cease further gunnery activities, engage in thorough clean-up of the site, and return it to the people of Hawai'i not later than the original lease expiration date in 2029. It must also pay arrearages for the grossly insufficient rent. The environmental damages from the continued military training use at PTA are substantial. We continue to oppose further retention of the PTA by the DOD as the risk of damage to the environment and ecosystem is great and the likelihood of restoration is low to the detriment of the Native Hawaiian community, the community at large, and indigenous plants and animals.</p>	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
	Hawaii Island Chamber of Commerce	<p>Thank you, and good evening. My name is Miles Yoshioka, M-I-L-E-S, Y-O-S-H-I-O-K-A, and I represent the Hawai'i Island Chamber of Commerce, an organization of nearly member businesses, professionals and nonprofits from primarily East Hawai'i. We fully support the U.S. military's training mission at Pohakuloa Training Area. Allowing the full retention of the acres of land currently leased from the State of Hawai'i will allow the Army to maintain those training requirements. Properly trained soldiers -- properly training soldiers for their crucial deployments is a paramount responsibility of the U.S. Army. PTA provides an unparalleled venue to accomplish this goal and prepare our troops for the challenges they will face when sent to counter threats to American citizens and our national interests or to support our allies. Training saves lives, and we owe it to the brave men and women who annually arrive at PTA to receive the instruction and training that they need. Many of our local men and women in uniform, our friends, our neighbors, our family, including those in the Hawai'i Army Air National Guard, Hawai'i Army National Guard, U.S. Army Reserves, and all other branches of the military train at PTA. State and county of Hawai'i first responders, including our fire fighters and police, train at PTA facilities and ranges. Additionally, PTA fire and rescue team members are the first responders in the Saddle area handling emergencies in the first critical minutes with fire trucks and Blackhawk helicopters at their disposal. This is extremely important to the health and safety of the many drivers, hunters, and visitors in the area. For these and other reasons, the Hawai'i Island Chamber of Commerce strongly supports the renewal of the lease for the state land at Pohakuloa. Thank you very much.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Nancy Redfeather	Ka Ohana O Na Pua	<p>The U.S. Army has now completed the Draft EIS that will lay out and analyze its proposal to retain up to approximately 23,000 acres of state-owned land at Pohakuloa Training Area (PTA) for military training, the public has been invited to comment on this EIS Draft. I would like to submit this statement as my Testimony. Ka Ohana O Na Pua is a 31 year old state and federal non-profit whose mission is to provide agricultural education for keiki to kupuna. It is my understanding that The area has been used for military training since 1943, and the state-owned land has been leased by the Army since 1964. PTA is the largest contiguous livefire range and maneuver training area in the state and is located between Mauna Loa, Mauna Kea, and Hualalai on the island of Hawai'i. Of the 132,810 acres at PTA, approximately 23,000 are leased from the state. The current 65-year lease is set to expire in August 2029. I am opposed to the continued occupation of State lands on Hawaii Island for military training exercises and I would like to briefly identify points that the final EIS should seriously consider in detail.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Nancy Redfeather	Ka Ohana O Na Pua	<p>1. In the Army's lease agreement with the State of Hawaii, you are required to "make every reasonable effort to remove or deactivate all live or blank ammunition upon completion of a training exercise or prior to entry by the said public, whichever is sooner." Has the Army complied with this lease provision and what were the steps taken and when to fulfill this promise? 2. A thorough investigation of the entire area should be undertaken to determine whether there is any military debris remaining and that would also include unexploded ordnance on any lands that have been used for training/exercises over the historical time period of your occupation. I know that over many years, there have been many Cultural Monitors who spent extensive time on the Pohakuloa lands and have observed firsthand military debris, including unexploded ordnance and spent shell casings on the grounds of the lands leased by the Army. ?</p>	<p>As noted in Section 3.5.4.11, soldiers are required to collect casings from spent rounds, wood boxes, and other solid waste debris generated during live-fire training and return them to the ammunition holding area and ammunition supply point for recycling or disposal, as appropriate. Range Operations personnel oversee cleanup of ranges when the soldiers have completed their training.</p> <p>Sections 3.5 and 3.15 supplemented with relevant information from PTA Range Operations Standard Operating Procedures regarding cleaning ranges after training.</p> <p>Text clarified to state Army removes or deactivates all live and blank ammunition upon completion of a training exercise in compliance with the lease and removes solid waste prior to departing a training area or range facility in accordance with the U.S. Army Garrison, Pohakuloa (USAG-PTA) External Standard Operating Procedures (2018).</p> <p>In accordance with the lease and under the provisions of existing law, the Army retains responsibility for cleanup and restoration of former training areas. After the lease expires, if deemed necessary, the Army would follow Army regulations to determine how and when the cleanup and restoration of State-owned land not retained would occur, following the CERCLA process.</p>
Nancy Redfeather	Ka Ohana O Na Pua	<p>3. There was a draft document titled: "Action Memorandum for the Time Critical Removal Action" prepared in 3/2015 by the US Army Garrison at Wheeler Army airfield on Schofield Barracks in Wahiawa, Oahu, Hawaii. This bazooka range was used as a military maneuver area through the early 2000s. During the joint DLNR/Army inspection in 2014, the area was found to be "heavily contaminated on the surface with potentially explosive materials and munitions debris. 4 different types of ordnance were observed to be present.</p> <p>1.) M29A2 training rounds with dummy M405 fuses                  2.) Practice 81mm mortars                  3.) Other high explosive anti-tank rifle grenades                  4.) M28A2 bazooka rounds with M404 fuse 5.) M30 white phosphorus bazooka rounds</p> <p>At that time the Army noted the number of ordnance present on the ground "coupled with the accessibility to the public make for the potential for significant danger to public health and welfare." Estimated cost of cleanup in 2015 was \$2,353,000.00. The reason the Army recommended this cleanup was that it "presents an imminent and substantial endangerment to public health, or welfare, or the environment." Any final EIS should summarize the details and the status of that cleanup effort. Was it accomplished, is it now safe for the public and the environment, what and how much waste was collected from the area, where was it disposed?</p>	<p>Section 3.5.4.11 provides information regarding the 2015 cleanup of MEC and lack of chemicals of concern at the PTA Former Bazooka Range, which includes the High Mortar Concentration Area. Text revised with MEC and debris quantities from the Final Site Specific Final Report, Removal Action, Pohakuloa Training Area Former Bazooka Range, Island of Hawaii (February 2016).</p> <p>The disposition of the MEC from the Former Bazooka Range is outside the scope of the EIS. The MEC was disposed of in accordance with federal and state laws.</p>
Nancy Redfeather	Ka Ohana O Na Pua	<p>4. This upcoming EIS should fully and transparently disclose the extent to which the ungulates exist in the area used by the Army for training exercises and the damage they have caused to date. ?</p>	<p>Recreational activities including hunting are described in Section 3.2.4.2. Game management and ungulate control are described in Section 3.3.4.3.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Nancy Redfeather	Ka Ohana O Na Pua	<p>5. To my knowledge, from reading reports of the number and significance of cultural sites the investigation into this aspect of land use has been superficial. The final EIS should include a thorough inventory of all historic sites in the area with photos and GPS location. This could be one of the Appendix pages. It should also include a through discussion of the history and the cultural significance of Pohakuloa through historical time to the present. (this would show your sensitivity to the host culture) The EIS should also include a detailed discussion as to the current condition of each of these sites and how they have changed while the Army has been using these lands. Concerns still Linger from the 8/2018 EA Finding of No Significant Impact 1. I can see that a through evaluation of the potential ancient and historical sites has not been completed. There have been identified 1,198 sites, 822 have not been evaluated, and 364 are traditional Hawaiian sites, and that only 20% of the high impact zone has been evaluated. That no sacred sites were identified seems highly unlikely. This information should have affected the final determination of No Significant Impact.</p>	<p>It is Army practice to protect the location of sensitive sites. EIS Section 3.4.4.3 has been revised to describe why certain areas have not been surveyed. Figures have been added to show where surveys have been completed, and the general locations and types of sites within state-owned lands.</p> <p>Specific significance criteria are presented for each resource area. These are standards or thresholds by which a significance conclusion can be drawn.</p>
Nancy Redfeather	Ka Ohana O Na Pua	<p>2. While I understand that there has been numerous lava flows as well as 100 years of ranching in the zone, and that a collection of physical artifacts exists that was recovered through surveys, it seems that there very well could be long term impacts to the Island of Hawai'i through continued use of the area as a training area for the use and training of various weapon systems. These impacts would include, contamination of the ground water serving communities at lower elevations, contamination of soils from depleted uranium pieces and dust kicked up in the impact zone unknowingly (because you really don't know where all the DU lies) impacting both the soldiers and communities down wind, and the potential for ancient sites which have not yet been surveyed to be destroyed. 3. The Hawai'i County Council has passed various Resolutions that clearly stated their concerns about these potential impacts. Resolution 639-88 urges the military to address the potential hazards of DU at the Pohakuloa Training Area. This Resolution has 8 action areas including ceasing of live fire and clean up of DU that have not been adequately addressed in the past 9 years. As a courtesy to Hawaii Island County Government this needs to be addressed. Again could be an Appendix page. ?</p>	<p>The Army makes every effort to be a good neighbor and steward of the environment; however, Hawaii County Council resolutions express policy or opinions and therefore are not compulsory to the federal government.</p> <p>As noted in Section 3.5.4.12, the Army has conducted the following actions with respect to depleted uranium at PTA: 1) soil sampling, 2) air sampling, 3) a health and risk assessment, 4) implement Department of Defense Directive 4715.11 that prohibits the firing of high-explosive munitions into the depleted uranium impact locations, and 5) obtain and adhere to a NRC license for possession of depleted uranium.</p> <p>Section 3.5.4.12 notes that the Army completed a 1-year airborne uranium monitoring program in 2009 to determine if depleted uranium has impacted local air quality. Total airborne uranium levels collected from 210 air samples at PTA were within the range of naturally occurring uranium in Hawaiian soils and rock and were several orders of magnitude below the U.S. and international chemical and radiological health guidelines; therefore, the depleted uranium has not impacted local air quality.</p>
Nancy Redfeather	Ka Ohana O Na Pua	<p>4. The State of Hawai'i land lease does not allow for storage of nuclear storage on site, even though the NRC has given Pokahuloa a permit to possess DU on site. The Army has not been transparent with the public about the use of DU coated weapons being used currently on site. IF the Army is not using DU coated weapons and firing them at the Pohakuloa Training Site, you should tell the public. That would make a huge difference in many peoples minds of how they view your continued presence here.</p>	<p>Section 3.5.4.12 revised to clarify that depleted uranium-containing/coated munitions are no longer authorized for use in Hawaii and the only depleted uranium-containing/coated munition used at PTA was the Davy Crockett M101 spotting round, which was used between 1962 and 1968.</p>
Nancy Redfeather	Ka Ohana O Na Pua	<p>Personal Observations Over the past 24 years. I live in the Kawanui Ahupua'a of Kona at the 1,500 ft. elevation and many times over the past 20 years my house has shook from the ordnance that has been used at Pokaukoa. I have also been out on my farm and literally felt the earth shake under my feet. Can this possibly trigger earthquakes or shift movements of magma beneath the surface? Please include such seismic and geological information in the final EIS. Thank you for taking all these concerns under consideration when laying out your plan for the final EIS. I will look for updates on this process in our local news, unless you of course wish to update the stakeholders in a timely manner.</p>	<p>Section 3.8.6.1 of the EIS has been clarified to note "Military training at PTA has no effect on the frequency of volcanic eruptions and seismic hazards..."</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
	Kupuna for the Moopuna	<p>Kūpuna for the Mo'opuna, a network of homestead farmer beneficiaries of the Hawaiian Homes Commission Act from Pana'ewa, Hawai'i, provide comments in strong support of the Army's No Action Alternative in accordance with Council on Environmental Quality regulations. (ES.8.4. No Action Alternative)</p> <p>We strongly support the position that when the lease expires in 2029, the Army must lose all access to the land. No extension. No renewal. No new lease.</p> <p>1.) Describe the current condition of the leased area at PTA subsequent to the August 2019 Hawai'i Supreme Court decision - affirming Judge Chang's 2018 ruling that "military needs to clean up mess and destruction; follow through on your commitments" – along with the measures that have been taken that fully describe how the terms of the existing lease have been satisfactorily fulfilled.</p>	<p>Sections 3.2.4 and 3.5.4 revised to state that DLNR has implemented the Court Ordered Management Plan and site visits are occurring. Army has received no corrective actions from the site visits.</p>
	Kupuna for the Moopuna	<p>2.) Describe the detailed plan to clean up debris and toxins at PTA before the lease expires. Explain how this plan will differ from the long documented history of military pollution throughout Hawai'i.</p> <p>3.) Describe how the State can meet fiduciary obligations to native Hawaiians and the public to protect the land since it is, in fact, the Army that has left the land in a degraded and hazardous condition at Pōhakuloa and other sites throughout Hawai'i. <a href="https://www.civilbeat.org/2021/01/the-history-of-u-s-military-pollution-in-hawaii-is-extensive/">https://www.civilbeat.org/2021/01/the-history-of-u-s-military-pollution-in-hawaii-is-extensive/</a> <a href="https://www.hawaiitribune-herald.com/2022/04/14/hawaii-news/ordnance-removal-enters-next-phase-following-9-months-of-scanning-near-waimea-army-personnel-will-begin-digging-for-munitions/">https://www.hawaiitribune-herald.com/2022/04/14/hawaii-news/ordnance-removal-enters-next-phase-following-9-months-of-scanning-near-waimea-army-personnel-will-begin-digging-for-munitions/</a></p>	<p>In accordance with the lease and under the provisions of existing law, the Army retains responsibility for cleanup and restoration of former training areas. After the lease expires, if deemed necessary, the Army would follow Army regulations to determine how and when the cleanup and restoration of State-owned land not retained would occur, following the CERCLA process.</p> <p>The Army's cleanup efforts after training exercises are discussed in Section 3.5.4.11. Text revised to state Army removes or deactivates all live and blank ammunition upon completion of a training exercise in compliance with the lease and removes solid waste prior to departing a training area or range facility in accordance with the U.S. Army Garrison, Pohakuloa (USAG-PTA) External Standard Operating Procedures (2018).</p> <p>The State's obligations to native Hawaiians are outside the scope of the EIS.</p>
	Kupuna for the Moopuna	<p>4.) Explain how claims that land retention is "necessary" are credible, since the military also claimed Kaho'olawe, the Kapūkākī (Red Hill) fuel tanks, Mākua Valley, Waikāne Valley, and Stryker armored fighting vehicles were all "necessary."</p>	<p>The purpose and need for the Proposed Action are discussed in Section 1.3 of the EIS.</p>
	Kupuna for the Moopuna	<p>5.) Explain why a \$210 million dollar construction effort to "improve Army facility" at PTA was allowed to begin with the construction of new barracks in light of the lease set to expire in 7 years. Explain why the Army continues to focus on adding on rather than cleaning up as required by law. <a href="https://www.hawaiitribune-herald.com/2022/04/27/hawaii-news/new-barracks-unveiled-at-pta-project-is-part-of-a-210-million-effort-to-improve-the-army-facility/">https://www.hawaiitribune-herald.com/2022/04/27/hawaii-news/new-barracks-unveiled-at-pta-project-is-part-of-a-210-million-effort-to-improve-the-army-facility/</a></p>	<p>The U.S. Government-owned parcel houses the Cantonment (Section 1.1.1 and Figure 3 -1) and is not a part of the State-owned land.</p>
	Kupuna for the Moopuna	<p>6.) Explain and describe the analysis of fire impacts and the serious concerns about staffing and equipment, and the history of several past fires. Include in this a complete disclosure of all records pertaining to the July/August 2021 upper Ke'āmuku / Waikoloa/ Pu'ukapu brush fire, the Big Island's largest brush fire, which coincided with PTA training.</p>	<p>Section 3.16.4 has been updated to include impacts from recent wildland fires.</p>
	Kupuna for the Moopuna	<p>7.) Provide a complete disclosure of past history and current information on Depleted Uranium (DU) at PTA, e.g., Army not accounting for DU, Army questionable air monitoring of DU, Army unauthorized activities with DU, Army proposals to avoid Nuclear Regulatory Commission (NRC) oversight, Army documents with misinformation on DU, and possible Army contractor DU bias.</p>	<p>Section 3.5.4.12 revised to clarify that the State-owned land only includes one depleted uranium firing location, the State-owned land does not include the four depleted uranium impact locations, and surveys did not identify any indication of depleted uranium-containing materials on the State-owned land. The Nuclear Regulatory Commission issued a license to PTA in 2013 for possession of depleted uranium related to former training with the Davy Crocket Weapons System. The license covers the entire area of all four ranges (firing locations and impact locations) and does not distinguish between the State-owned land and U.S. Government-owned land.</p> <p>Section 3.5.4.12 expanded with additional information about depleted uranium and associated studies at PTA (i.e., archival research, site reconnaissance, radiological instrumentation, soil sample results).</p> <p>Section 3.6.4 discusses surveys and fugitive dust monitoring for depleted uranium at PTA.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
	Kupuna for the Moopuna	<p>8.) Explain the reason for engaging elementary-school aged children and high school minors in activities at PTA with contaminated soil, unexploded munitions and other harmful by-products of live-fire testing (including depleted uranium from some of the ammunition used there, and other chemicals). <a href="https://www.hawaiitribune-herald.com/2018/04/23/hawaii-news/earth-day-at-pta-draws-hundreds-of-students/">https://www.hawaiitribune-herald.com/2018/04/23/hawaii-news/earth-day-at-pta-draws-hundreds-of-students/</a> <a href="https://www.hawaiitribune-herald.com/2022/05/13/hawaii-news/experience-pta-day-returns-to-showcase-cultural-environmental-efforts-at-facility/">https://www.hawaiitribune-herald.com/2022/05/13/hawaii-news/experience-pta-day-returns-to-showcase-cultural-environmental-efforts-at-facility/</a> <a href="https://www.civilbeat.org/2019/08/hawaii-has-failed-to-take-care-of-pohakuloa/">https://www.civilbeat.org/2019/08/hawaii-has-failed-to-take-care-of-pohakuloa/</a></p>	<p>Students are not permitted into areas of PTA known or suspected to contain contaminated soil or munitions and explosives of concern. The Army completed a 1-year airborne uranium monitoring program in 2009 to determine if depleted uranium has impacted local air quality. The monitoring program collected 210 air samples from three sites upwind and downwind of PTA to provide a basis of comparison. The monitoring program concluded that the depleted uranium had not impacted air quality at PTA or in the surrounding area because the total airborne uranium levels in the collected particulate matter samples were within the range of naturally occurring uranium in Hawaiian soils and rock and were several orders of magnitude below U.S. and international chemical and radiological health guidelines. See Sections 3.5 and 3.6 for this and additional information of depleted uranium.</p>
	Kupuna for the Moopuna	<p>9.) Explain and describe the Permissible Sound Levels of the PTA aircrafts when flying over Hawaiian Homes Commission Act agricultural/residential homestead communities of Pana'ewa and Keaukaha and the plans to address aircraft noise pollution, especially at night. Include descriptions of "sometimes loud" noises of "essential training activities at Pōhakuloa Training Area (PTA) in March [2022] that may be heard by surrounding communities." <a href="https://www.army.mil/article/254373/march_training_convoy_and_hunting_advisory_for_pohakuloa_training_area_pta">https://www.army.mil/article/254373/march_training_convoy_and_hunting_advisory_for_pohakuloa_training_area_pta</a></p>	<p>Hawai'i state Department of Health permissible sound levels are presented in Table 3-13, and additional categories for community noise exposure is presented just below that table. Noise generated by aircraft is discussed in Section 3.7.4 and Section 3.13.4.1.</p> <p>Section 3.7.4 discusses the impacts of weather and noise, which is consistent with the article "March training, convoy and hunting advisory for Pōhakuloa Training Area (PTA)."</p>
Wendy Laros	Kona-Kohala Chamber of Commerce	<p>The Kona-Kohala Chamber of Commerce strives to enhance the quality of life for our community through a strong, sustainable economy on Hawai'i Island. With 430 member businesses and organizations, we exist to provide leadership and advocacy for a successful business environment in West Hawai'i.</p> <p>We support the U.S. military's training mission and land retention at Pōhakuloa Training Area. As a member of the PTA Advisory Committee, we have been to the site multiple times and understand the importance of this State-owned land. We are aware that the lease expires in 2029 and this Proposed Action is to retain the U.S. Government's lease. This 23,000 acre parcel is essential to the training mission and includes substantial infrastructure investments, allows access between U.S. Government-owned lands, and maximizes the use of the impact area.</p> <p>In regards to the Draft EIS, we highly recommend Alternative 1: Full Retention. The U.S. Army would retain the land and substantial infrastructure investments while continue training without downtime.</p> <p>Beyond training military personnel, PTA provides significant benefits to the environment. In a cooperative agreement with Colorado State University, PTA's natural resources team manages and maintains indigenous and endemic plant species found in the area. In partnership with Schofield Barracks and University of Hawai'i's Lyon Arboretum, horticulturists, botanists and biologists work to save endangered endemic species through cultivation and seed storage.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Wendy Laros	Kona-Kohala Chamber of Commerce	<p>Additionally, PTA provides crucial services in wildfire management. In July and August of 2021, the Mana Road fire scorched more than 42,000 acres on Hawai'i Island. PTA supported the effort to put out the fire with 15 firefighters with their trucks along with four bulldozers. The U.S. Army provided five helicopters with 25 crewmembers and seven firefighters from Oahu. The Army aircraft conducted 250 water bucket drops totaling 170,000 gallons of water. This effort and the many first responder actions taken by PTA are greatly appreciated by our community!</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Jim Albertini	Malu 'Aina Center for Non-violent Education in Action	<p>I mentioned earlier about Howard Killian, the Colonel who testified at the County Council that the depleted uranium used at Pohakuloa is five times more than what's stated in the EIS. 400 rounds to 2000 or more.</p> <p>He also stated that depleted uranium was not prohibited from the use in training until 1996. Now, it was used as a spotting round by the Davey Crockett in the 1960s, that we know of. So that's 30 years when it was not prohibited from use in training. Now, what does that tell you? If it was not prohibited from use in training was it likely used? My hunch is that there is a hell of a lot more depleted uranium up there than what the military wants us to think.</p>	<p>Section 3.5.4.12 revised to state that based on extensive archival research, only 716 Davy Crockett M101 spotting rounds were allocated to Hawaii. Additionally, based on the archival research and field surveys, up to 400 depleted uranium spotting rounds were fired at PTA.</p> <p>Section 3.5.4.12 revised to clarify that depleted uranium-containing/coated munitions are no longer authorized for use in Hawaii and the only depleted uranium-containing/coated munition used at PTA was the Davy Crockett M101 spotting round, which was used between 1962 and 1968.</p> <p>Section 3.5.4.12 of the EIS expanded with additional information about depleted uranium and associated studies at PTA (i.e., archival research, site reconnaissance, radiological instrumentation, soil sample results).</p>
Jim Albertini	Malu 'Aina Center for Non-violent Education in Action	<p>And this depleted uranium, it has a half life of 4.5 billion years. Billion. And when it's hit with high explosive, it turns into depleted uranium oxide particles. It can be carried long distances in the wind. It can be easily inhaled. And when you inhale it gets into the lymph system and goes to various organs. It can cause cancer. Now, the person the Hawai'i County Council said the military should work with is Dr. Lauren Pang, M.D. 24 years Army Medical Corp., World Health Organization. You have ignored him. He's an expert on depleted uranium.</p>	<p>Depleted uranium is discussed in Sections 3.5 and 3.6 of the EIS. Section 3.5.4.12 notes that per DODD 4715.11, high explosive munitions are not permitted to be fired into the depleted uranium impacts areas within the impact area.</p> <p>Section 3.5.4.12 notes that the Army completed a 1-year airborne uranium monitoring program in 2009 to determine if depleted uranium has impacted local air quality. Total airborne uranium levels collected from 210 air samples at PTA were within the range of naturally occurring uranium in Hawaiian soils and rock and were several orders of magnitude below the U.S. and international chemical and radiological health guidelines; therefore, the depleted uranium has not impacted local air quality.</p>
Jim Albertini	Malu 'Aina Center for Non-violent Education in Action	<p>And the eight action points of that 639-08, it's the first one was stop all live fire until there is a complete independent assessment of the DU present, and it's cleaned up. There were seven other actions in that thing. The only councilman that voted against that in 2008 was Pete Hoffman from Waikaloa, a retired Army Intelligence Colonel. A very decent man. But I remember talking to him and said, "Pete, why did you vote against this resolution when the eight other council members voted for it?" He said, "Well, the military has a mission." And I said, "Even if the mission is endangering the lives of the troops and the people it's supposed to be defending?" "Yeah, they have got a mission to do." Now, that's insanity. A good person saying that is insanity. You lose perspective on it. I had the Chief Engineer of the Nevada test site visit our farm. Gordon Yates was his name. And he was in charge of setting up 20 to 30,000 tons of dynamite to simulate a nuclear blast. And they would do a couple of those and then they would do a nuke to compare it. And he said the physicists were always pressuring him and the military, hurry up, hurry up. And he was saying, look, I have to be careful, and he was talking about the lives of the workers. But the military said, "Oh, yes, be careful. We wouldn't want to have to abort the experiment." Now, that's more insanity. So you have got to get a perspective on this from all the citizens here and how we view you folks and your mission up there. We're a military sacrifice zone. Depleted uranium is only one of many toxins of the toxic stew that you put on this island, and we don't appreciate it.</p>	<p>Section 3.5.4.12 of the EIS discusses the various studies of depleted uranium at PTA, including soil samples, air samples, and a health and risk assessment.</p> <p>Section 3.5.4.12 revised to clarify that the State-owned land only includes one depleted uranium firing location, the State-owned land does not include the four depleted uranium impact locations, and surveys did not identify any depleted uranium-containing materials on the State-owned land.</p> <p>Section 3.5.4.12 expanded with additional information about depleted uranium and associated studies at PTA (i.e., archival research, site reconnaissance, radiological instrumentation, soil sample results).</p> <p>The Army makes every effort to be a good neighbor and steward of the environment; however, Hawaii County Council resolutions express policy or opinions and therefore are not compulsory to the federal government.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
	Malu 'Aina Center for Non-violent Education in Action	<p>Aloha kakou. My name is Jim Albertini. I'm president of a non-profit organization Malu'aina Center for Non-violent Education in Action. Here is where I stand. I go beyond the no action alternative. I'm not renewing the lease. I'm for canceling that lease here and now. Stop the bombing.</p> <p>Comprehensive independent assessment of the military toxic mess at PTA, the entire 133,000 acres. Not simply the 23,000.</p> <p>There also needs to be thorough cleanup guaranteed with federal funds and a reserve fund, because there is always more after they clean up the mess, at Kaho'olawe and other sites. I brought with me a map of the Big Island, that our organization did more than 20 years ago. It documents 57 military sites on this island. Hundreds of thousands of acres contaminated with toxins. Many of them are Army. Army is not alone, though. Navy and others. But I want to make one thing. The Army has proven to be habitual liars. I will give you just one example of this related to PTA. The Army repeatedly lied that it never used depleted uranium weapons at PTA and other Hawai'i sites, and then the cat jumped out of the bag. Peace activists on O'ahu unearthed legal documents that proved the military lied. DU had been used in training at Schofield, at PTA, likely at Makua Valley, possibly Kaho'olawe and other sites. The lies about DU are just one of many. I am going to cite just one example. In the 1960s, the same time the Army got the lease at Pohakuloa, the Army got another lease from the state. A state land in the Waiakea Forest, the water shed of Hilo. It told the state it wanted to do weather testing. The Army was lying. They secretly tested some of the most toxic chemical and biological weapons in the U.S. Arsenal in the Hilo watershed, including Sarin nerve gas. 1/50th of a drop kills you. The Army repeatedly denied that it did that. And then Patsy Mink, the Congresswoman from Hawai'i, disclosed the facts. The Army still tried to dodge it. When she disclosed it, the Mayor of Hawai'i Island at the time, Shunichi Kimura, he said cancel the lease. They lied to us. And there was an uproar here and they canceled that lease. But the issue is this. How many people got sick and died because of the Army's lies in the Waiakea Forest area?</p>	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
	Malu 'Aina Center for Non-violent Education in Action	<p>How many got sick and died because of the depleted uranium and the toxic stew of chemicals you have used at Pohakuloa. And many of you don't even know the facts, because you are only short termers. I will give you an example from the EIS.</p> <p>One of the preparers, his name is Howard Killian, I understand he was the Garrison Commander, Colonel, he testified at the Hawai'i County Council in 2008, I was there, that based on the number of people certified and trained to use the Davey Crockett nuclear weapon that fired the DU spotting rounds, 2000 or more rounds were fired at PTA alone. In your EIS, you list maximum 400 rounds. So Killian testified at least five times more were used.</p>	<p>Section 3.5.4.12 revised to state that based on extensive archival research, only 716 Davy Crockett M101 spotting rounds were allocated to Hawaii. Additionally, based on the archival research and field surveys, up to 400 depleted uranium spotting rounds were fired at PTA.</p> <p>Section 3.5.4.12 revised to clarify that depleted uranium-containing/coated munitions are no longer authorized for use in Hawaii and the only depleted uranium-containing/coated munition used at PTA was the Davy Crockett M101 spotting round, which was used between 1962 and 1968.</p>
	Malu 'Aina Center for Non-violent Education in Action	<p>Sum it up this way. The truth of the matter is this: Pohakuloa is the Big Island's toxic Red Hill. We all live downhill, downwind, and downstream of the toxic stew at PTA, where millions of live rounds have been fired annually for more than 70 years. And the last point I will end on is in December I asked for all the documents concerning the water wells being drilled at PTA. I said, all electronic and paper documents and communications dated from January 2013 to December 2021 related to discussions, studies, evaluations and plans for any drinking water wells at PTA. And I mentioned Red Hill. Here it is, four or five months later. All that I received, one page from an Army person, Mark Mitsunabi (ph.). One page of a document that tells you nothing.</p>	Section 3.9.4 of the EIS describes the research undertaken in 2012 and 2017 to improve the understanding of the County of Hawaii's groundwater system. Groundwater extraction from State-owned land at PTA is not proposed or foreseen as part of the Proposed Action.

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
	Malu 'Aina Center for Non-violent Education in Action	And finally, here are two resolutions passed by the County Council in 2008, 639-08, 701-08. The County Council is this island passed it by a large majority, 8 to 1, and unanimously for the other one. The Army has done nothing on these resolutions. You are insulting us. You are a fraud. And it's got to stop.	<p>The Army makes every effort to be a good neighbor and steward of the environment; however, Hawaii County Council resolutions express policy or opinions and therefore are not compulsory to the federal government.</p> <p>As noted in Section 3.5.4.12, the Army has conducted the following actions with respect to depleted uranium at PTA: 1) soil sampling, 2) air sampling, 3) a health and risk assessment, 4) implement Department of Defense Directive 4715.11 that prohibits the firing of high-explosive munitions into the depleted uranium impact locations, and 5) obtain and adhere to a NRC license for possession of depleted uranium.</p> <p>Section 3.5.4.12 notes that the Army completed a 1-year airborne uranium monitoring program in 2009 to determine if depleted uranium has impacted local air quality. Total airborne uranium levels collected from 210 air samples at PTA were within the range of naturally occurring uranium in Hawaiian soils and rock and were several orders of magnitude below the U.S. and international chemical and radiological health guidelines; therefore, the depleted uranium has not impacted local air quality.</p>
Jim Albertini	Malu 'Aina Center For Non-violent Education & Action	<p>(Due to time constraints, not all of the comments below could be offered verbally at the April 25, 2022 Draft EIS meeting held at the Imiloa Astronomy center in Hilo, Hawaii, but I want the entire statement included as part of the record.</p> <p>April 25, 2022 Army Draft EIS meeting on Pohakuloa lease</p> <p>Here's where I stand. I go beyond the "No Action Alternative" of not renewing any of the leased lands when the lease expires in 2029. I'm for canceling the lease here and now. I say --</p> <ol style="list-style-type: none"> <li>1. Stop all Bombing and all live-fire training at PTA now.</li> <li>2. I call for a comprehensive independent assessment of the massive military toxic mess at PTA --all 133,000-acres, not simply the 23,000-acres of leased lands, where firing points are located. We need to look at the impact area too.</li> <li>3. There also needs to be a thorough Clean up with guaranteed federal funds for the leased lands and other PTA lands --more than 85,000 acres taken by presidential and governor's executive orders, lands simply seized without any compensation. These 85,000 acres are NOT US government owned lands as the Army claims. They are seized without ANY compensation.</li> <li>4. Return all the lands, the entire 133,000-acres to Kanaka Maoli. Besides the guaranteed federal funds for clean up, there needs to be additional Reserve funds guaranteed for future clean up of missed UXO and toxins on the initial clean up.</li> </ol> <p>The US Army has proven to be a habitual liar.</p> <p>The Army repeatedly lied that it had never used depleted uranium weapons in training at PTA and other Hawaii sites. Then the cat ju5, 2022 Elmped out of the bag. Peace activists on Oahu unearthed legal documents that proved the military lied. DU had been used in training at Schofield, at PTA, likely at Makua valley and possibly Kaho'olawe and other sites.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Jim Albertini	Malu 'Aina Center For Non-violent Education & Action	<p>The lies about DU are just one of many. Because of time restraints I'll give just one other example of blatant Army lies. Hold up map of 57 military sites on Hawaii island. Map attached and list of 57 sites In the 1960s, around the same time the Army got a lease of State lands at PTA, the Army also got a lease of state lands in the Waiakea forest area, Hilo's watershed. The Army said it wanted to do "Weather testing." Well, the Army way lying.</p> <p>The Army secretly tested chemical and biological weapons in the Hilo watershed, including sarin nerve gas that kills at 1/50 of a drop. Despite alarms sounded in the community the Army repeatedly denied use of chemical and biological weapons. But such testing was confirmed by Hawaii's congressional rep. Patsy Mink. Then Hawaii county mayor, Shunichi Kimura spoke out. The Army lied to us, he said. Cancel the lease. There was an uproar and the lease was canceled, but the damage was done. How many people got sick and died from the Army's poison and lies is still unknown, but hunters have told me there are areas in the Waiakea forest where today, nothing grows, more than 50 years after the chemical and biological secret weapons testing. Congresswoman Patsy Mink and Mayor Shunichi Kimura were people with courage to stand up to the military. Where are such people today? Where does our current Mayor stand? Our council members, Our State legislators and Congressional reps. I'm sad to say, they all appear to me to be military lap dogs. I hope they prove me wrong.</p>	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Jim Albertini	Malu 'Aina Center For Non-violent Education & Action	<p>The truth of the matter is that Pohakuloa is the Big Islands Toxic Red Hill. We all live, downhill, downwind and downstream of the Army's Pohakuloa Toxic stew, where millions of live-rounds have been fired annually for more than 70 years.</p> <p>The Army continues to lie. In the draft PTA EIS the number of DU rounds fired at PTA is lowballed. The figure stated is 400 rounds. Yet the Army's own Garrison Colonel, Howard Killian testified before the Hawaii county council in 2008 that based on the number of people trained and certified to fire the Davy Crockett nuclear weapon system at PTA the number of rounds fired was 2000 or higher. That's 5 times what the Army has stated in its EIS. I should note that a Howard Killian is noted in the draft PTA EIS in the list of preparers. Is that the same person. Col. Howard Killian also testified before the HCC that the Army was NOT prohibited from using DU in training until 1996. What does that tell you? It tells me there is likely a hell of a lot more DU at Pohakuloa than simply what was used secretly as spotting rounds for the Davy Crockett N-weapon system in the 1960s.</p>	<p>Section 3.5.4.12 revised to state that based on extensive archival research, only 716 Davy Crockett M101 spotting rounds were allocated to Hawaii. Additionally, based on the archival research and field surveys, up to 400 depleted uranium spotting rounds were fired at PTA.</p> <p>Section 3.5.4.12 revised to clarify that depleted uranium-containing/coated munitions are no longer authorized for use in Hawaii and the only depleted uranium-containing/coated munition used at PTA was the Davy Crockett M101 spotting round, which was used between 1962 and 1968.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Jim Albertini	Malu 'Aina Center For Non-violent Education & Action	<p>The real answer is blowing in the wind over Hawaii Island. Please note DU has a half-life of 4.5 BILLION years. That's right Billion years. And when DU metal is hit by high explosives, it burns and turns into DU oxide particles that can be carried long distances in the wind and easily inhaled, entering the lymph system, and causing cancer in various organs.</p> <p>In truth, Hawaii Island is a military sacrifice zone. In July 2008, the HCC passed resolution 639-08 by a vote of 8-1 that called for 8 actions including stooping all live-fire at PTA until there was a comprehensive independent assessment of the DU at PTA and a clean up of the DU.</p> <p>The HCC also passed reso 701-08 by a 9-0 unanimous vote naming Dr. Lorrin Pang, MD and 24 years in the Army medical corps, as the county's designated representative to work with the Army of the DU issue. The Army has refused to carry out any of the 8 actions named by the HCC and to work with Dr. Pang.</p> <p>This failure of the Army to carry out these measures is insulting and a disgrace. Are we living in a military dictatorship?</p>	<p>Per Department of Defense Directive 4715.11, high explosive military munitions are not permitted to be fired into depleted uranium impact locations, as noted in Section 3.5.4.12.</p> <p>The Army makes every effort to be a good neighbor and steward of the environment; however, Hawaii County Council resolutions express policy or opinions and therefore are not compulsory to the federal government.</p> <p>As noted in Section 3.5.4.12, the Army has conducted the following actions with respect to depleted uranium at PTA: 1) soil sampling, 2) air sampling, 3) a health and risk assessment, 4) implement Department of Defense Directive 4715.11 that prohibits the firing of high-explosive munitions into the depleted uranium impact locations, and 5) obtain and adhere to a NRC license for possession of depleted uranium.</p> <p>Section 3.5.4.12 notes that the Army completed a 1-year airborne uranium monitoring program in 2009 to determine if depleted uranium has impacted local air quality. Total airborne uranium levels collected from 210 air samples at PTA were within the range of naturally occurring uranium in Hawaiian soils and rock and were several orders of magnitude below the U.S. and international chemical and radiological health guidelines; therefore, the depleted uranium has not impacted local air quality.</p> <p>Section 3.5.4.12 expanded with additional information about depleted uranium and associated studies at PTA (i.e., archival research, site reconnaissance, radiological instrumentation, soil sample results).</p>
Jim Albertini	Malu 'Aina Center For Non-violent Education & Action	<p>Mike Donnelly, the PTA public affairs officer has been awarded the Big Is. Press clubs's Lava tube award for darkness, lack of openness, truth and transparency. It's further insulting, a disgrace, and a fraud that Mike Donnelly is the Army's community liaison. It speaks volumes. The Draft EIS is totally inadequate. It is in the Lava tube award tradition of darkness, hiding the truth of what's really going on at the Pohakuloa Toxic Area -- the number and kinds of toxic weapons being used and the longterm impacts on people, plants, and animals. Bombing the aina in my view is the ultimate desecration of our sacred mother earth. It's very basic -- stop bombing Mama!</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Jim Albertini	Malu 'Aina Center For Non-violent Education & Action	<p>Additional testimony on Pohakuloa draft EIS concerning State leased lands Chilling Army definition of "encroachment" EIS p. 3-14.</p> <p><a href="https://nam11.safelinks.protection.outlook.com/?url=https%3A%2F%2Ffiles.hawaii.gov%2Fdbed%2Ferp%2FDoc_Library%2F2022-04-08-HA-DEIS-Army-Training-Land-Retention-at-Pohakuloa-Training-Area-Vol-I.pdf&amp;data=05%7C01%7CATLR-PTA-EIS%40g70.design%7Cc82b552ed229487a7d1d08da46911113%7C69e712341e9d4d86abde1c80f4dbfcd4%7C1%7C1%7C637899886123823415%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IjEhaWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&amp;sdata=lc2MthOkvREskvaEV%2FAjXa36YDPJdPxG9j0yN0oYoe4%3D&amp;reserved=0">https://nam11.safelinks.protection.outlook.com/?url=https%3A%2F%2Ffiles.hawaii.gov%2Fdbed%2Ferp%2FDoc_Library%2F2022-04-08-HA-DEIS-Army-Training-Land-Retention-at-Pohakuloa-Training-Area-Vol-I.pdf&amp;data=05%7C01%7CATLR-PTA-EIS%40g70.design%7Cc82b552ed229487a7d1d08da46911113%7C69e712341e9d4d86abde1c80f4dbfcd4%7C1%7C1%7C637899886123823415%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IjEhaWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&amp;sdata=lc2MthOkvREskvaEV%2FAjXa36YDPJdPxG9j0yN0oYoe4%3D&amp;reserved=0</a> &lt;</p> <p><a href="https://nam11.safelinks.protection.outlook.com/?url=https%3A%2F%2Ffiles.hawaii.gov%2Fdbed%2Ferp%2FDoc_Library%2F2022-04-08-HA-DEIS-Army-Training-Land-Retention-at-Pohakuloa-Training-Area-Vol-I.pdf&amp;data=05%7C01%7CATLR-PTA-EIS%40g70.design%7Cc82b552ed229487a7d1d08da46911113%7C69e712341e9d4d86abde1c80f4dbfcd4%7C1%7C1%7C637899886123823415%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IjEhaWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&amp;sdata=lc2MthOkvREskvaEV%2FAjXa36YDPJdPxG9j0yN0oYoe4%3D&amp;reserved=0">https://nam11.safelinks.protection.outlook.com/?url=https%3A%2F%2Ffiles.hawaii.gov%2Fdbed%2Ferp%2FDoc_Library%2F2022-04-08-HA-DEIS-Army-Training-Land-Retention-at-Pohakuloa-Training-Area-Vol-I.pdf&amp;data=05%7C01%7CATLR-PTA-EIS%40g70.design%7Cc82b552ed229487a7d1d08da46911113%7C69e712341e9d4d86abde1c80f4dbfcd4%7C1%7C1%7C637899886123823415%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IjEhaWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&amp;sdata=lc2MthOkvREskvaEV%2FAjXa36YDPJdPxG9j0yN0oYoe4%3D&amp;reserved=0</a> &gt;</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Jim Albertini	Malu 'Aina Center For Non-violent Education & Action	<p>PTA works consistently to manage encroachment issues, defined by the Army as the "cumulative result of any and all outside influences that inhibit normal military training and testing" (Santicola, 2006).</p> <p>Additionally, the Implementation Guidance for Army Compatible Use Buffers broadens this encroachment definition to "All influences threatening or constraining testing and training activities required for force readiness and weapons acquisition. Encroachment stems from environmental (for example, noise, endangered species, cultural resources, unexploded ordnance [UXO], and munitions constituents [MC]), social (for example, urban sprawl), and economic (for example, changing land values) influences. Impacts include, but are not limited to, restrictions on available testing and training locations; restrictions on available times and duration for testing and training; reduced effectiveness of testing and training activities; and restrictions on weapons systems, equipment, and munitions used during testing and training. Land use and/or development that, individually or through cumulative effect, contributes to restricting the Army's ability to conduct mission activities."</p>	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Jim Albertini	Malu 'Aina Center For Non-violent Education & Action	<p>What about the "ENCROACHMENT" of military hazard sites on the resident and visitor population of Hawaii? Propublica lists 115 Hawaii military installations with 1000 military hazard sites. See below link. 115 Hawaii military installations with 1000 military hazard sites listed including sites at Pohakuloa. But the cumulative impact of all military hazard sites in Hawaii need to be addressed.</p> <p><a href="https://nam11.safelinks.protection.outlook.com/?url=https%3A%2F%2Fprojects.propublica.org%2Fbombs%2Fstate%2FH%23b%3D21.451552796916808%2C-169.7362891796875%2C25.481480947433596%2C-160.2880469921875%26c%3Dshrink&amp;data=05%7C01%7CATLR-PTA-EIS%40g70.design%7Cc82b552ed229487a7d1d08da46911113%7C69e712341e9d4d86abde1c80f4dbfcd4%7C1%7C1%7C637899886123823415%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQJjoiV2luMzliLCJBTiI6Ikh1aWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&amp;sdata=eK9bjWLHP6wtzfvVvITc%2FKsht5t%2ByDEZDBgYgVVwRQ%3D&amp;reserved=0">https://nam11.safelinks.protection.outlook.com/?url=https%3A%2F%2Fprojects.propublica.org%2Fbombs%2Fstate%2FH%23b%3D21.451552796916808%2C-169.7362891796875%2C25.481480947433596%2C-160.2880469921875%26c%3Dshrink&amp;data=05%7C01%7CATLR-PTA-EIS%40g70.design%7Cc82b552ed229487a7d1d08da46911113%7C69e712341e9d4d86abde1c80f4dbfcd4%7C1%7C1%7C637899886123823415%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQJjoiV2luMzliLCJBTiI6Ikh1aWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&amp;sdata=eK9bjWLHP6wtzfvVvITc%2FKsht5t%2ByDEZDBgYgVVwRQ%3D&amp;reserved=0</a> &lt;</p> <p><a href="https://nam11.safelinks.protection.outlook.com/?url=https%3A%2F%2Fprojects.propublica.org%2Fbombs%2Fstate%2FH%23b%3D21.451552796916808%2C-169.7362891796875%2C25.481480947433596%2C-160.2880469921875%26c%3Dshrink&amp;data=05%7C01%7CATLR-PTA-EIS%40g70.design%7Cc82b552ed229487a7d1d08da46911113%7C69e712341e9d4d86abde1c80f4dbfcd4%7C1%7C1%7C637899886123823415%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQJjoiV2luMzliLCJBTiI6Ikh1aWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&amp;sdata=eK9bjWLHP6wtzfvVvITc%2FKsht5t%2ByDEZDBgYgVVwRQ%3D&amp;reserved=0">https://nam11.safelinks.protection.outlook.com/?url=https%3A%2F%2Fprojects.propublica.org%2Fbombs%2Fstate%2FH%23b%3D21.451552796916808%2C-169.7362891796875%2C25.481480947433596%2C-160.2880469921875%26c%3Dshrink&amp;data=05%7C01%7CATLR-PTA-EIS%40g70.design%7Cc82b552ed229487a7d1d08da46911113%7C69e712341e9d4d86abde1c80f4dbfcd4%7C1%7C1%7C637899886123823415%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQJjoiV2luMzliLCJBTiI6Ikh1aWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&amp;sdata=eK9bjWLHP6wtzfvVvITc%2FKsht5t%2ByDEZDBgYgVVwRQ%3D&amp;reserved=0</a> &gt;</p>	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.

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Jim Albertini	Malu 'Aina Center For Non-violent Education & Action	<p>Additional testimony on draft Pohakuloa EIS on state leased lands submitted June 4, 2022 via email</p> <p>1. Both myself and the late Dr. Drake Logan, PhD who did extensive research on contaminants at Pohakuloa, were informed by different sources that several nuclear weapons (up to six in information provided to me), were exploded at Pohakuloa. One of my sources identified himself as a former military intelligence officer. Since Pohakuloa contains numerous firing points for weapons exploded in the impact area, it is possible that nuclear weapons, not simply Davy Crockett Nuclear weapon Depleted Uranium (DU) spotting rounds, were fired from the State leased lands into the impact area. What is needed is independent comprehensive soil testing in the impact area for strontium 90 and cesium 137, fission products of nuclear explosions. Such products would still be present today from nuclear explosions done in the 1960s. The soil samples could be collected by remote vehicles, and a sampling grid established for the impact area to make sure comprehensive independent testing is done that has the confidence of the community. The military testing so far of DU at PTA does NOT have the confidence of the community. In 2008, two resolutions were passed by the Hawaii County Council. Reso. 639-08 was passed by a vote of 8-1 and called for 8 action plans including the halt to all live-fire at PTA until comprehensive independent testing and monitoring was done and the DU cleaned up. The Military ignored all 8 actions of the Hawaii County Council. A second resolution passed unanimously 9-0 named Dr. Lorrin Pang, MD as the county's official liaison with the military. Dr. Pang spent 24 years in the Army medical corps. Why has the military/Army completely ignored the actions of the Hawaii County Council?</p>	<p>Per Department of Defense Directive 4715.11, high explosive military munitions are not permitted to be fired into depleted uranium impact locations, as noted in Section 3.5.4.12.</p> <p>The Army makes every effort to be a good neighbor and steward of the environment; however, Hawaii County Council resolutions express policy or opinions and therefore are not compulsory to the federal government.</p> <p>As noted in Section 3.5.4.12, the Army has conducted the following actions with respect to depleted uranium at PTA: 1) soil sampling, 2) air sampling, 3) a health and risk assessment, 4) implement Department of Defense Directive 4715.11 that prohibits the firing of high-explosive munitions into the depleted uranium impact locations, and 5) obtain and adhere to a NRC license for possession of depleted uranium.</p> <p>Section 3.5.4.12 notes that the Army completed a 1-year airborne uranium monitoring program in 2009 to determine if depleted uranium has impacted local air quality. Total airborne uranium levels collected from 210 air samples at PTA were within the range of naturally occurring uranium in Hawaiian soils and rock and were several orders of magnitude below the U.S. and international chemical and radiological health guidelines; therefore, the depleted uranium has not impacted local air quality.</p> <p>Section 3.5.4.12 expanded with additional information about depleted uranium and associated studies at PTA (i.e., archival research, site reconnaissance, radiological instrumentation, soil sample results).</p>
Jim Albertini	Malu 'Aina Center For Non-violent Education & Action	<p>2. Army Col. Howard Killian testified in 2008 before the Hawaii county Council that DU was NOT prohibited from use in training until 1996. Since Davy Crockett DU spotting rounds were first used at PTA in the 1960s, it very possible that much more DU was used at PTA than simply the Davy Crockett spotting rounds which for years the military had denied ever using at PTA. Again, comprehensive, independent testing needs to be done at PTA not simply on the various firing ranges on state leased lands but in the impact area where those weapons were fired to. The military is known for "PIECEMEALING" its environmental impacts and this needs to stop. Comprehensive views of the military impacts need to be done now.</p>	<p>Section 3.5.4.12 of the EIS expanded with additional information about depleted uranium and associated studies at PTA (i.e., archival research, site reconnaissance, radiological instrumentation, soil sample results).</p> <p>Section 3.5.4.12 revised to state that based on extensive archival research, only 716 Davy Crockett M101 spotting rounds were allocated to Hawaii. Additionally, based on the archival research and field surveys, up to 400 depleted uranium spotting rounds were fired at PTA.</p> <p>Section 3.5.4.12 revised to clarify that depleted uranium-containing/coated munitions are no longer authorized for use in Hawaii and the only depleted uranium-containing/coated munition used at PTA was the Davy Crockett M101 spotting round, which was used between 1962 and 1968.</p>
Jim Albertini	Malu 'Aina Center For Non-violent Education & Action	<p>3. Military plans for Buffer Zones, Sentinel Landscapes, and military land acquisition around PTA should also be addressed in the Pohakuloa Draft EIS.</p>	<p>Chapter 4 of the EIS provides a list of all identified past, present, and reasonably foreseeable projects, including those to be undertaken by the Army.</p>
Jim Albertini	Malu 'Aina Center For Non-violent Education & Action	<p>4. There needs to be a comprehensive listing of all weapons systems and munitions fired from the leased lands over the years of the State lease and also other weapons systems and munitions fired into the impact area at PTA. In the Stryker EIS of 2003 I believe, it was listed than 14.8 million live rounds are fired annually at PTA. Please provide current annual live-fire rounds fired every year since the Stryker EIS. Please also list all the various weapon systems and different kinds of munitions fired. In addition, B-52 and B-2 bombers fly non-stop from Missouri, Louisiana, and Guam and bomb PTA. They are strategic bombers. Are they dropping live conventional bombs and/or inert bombs in training for nuclear war? Full disclosure is needed. How many dummy (inert) bombs are fired at PTA annually. List all the various weapons systems and munitions. We need a comprehensive, not piecemeal view of what's going on at PTA.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

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Jim Albertini	Malu 'Aina Center For Non-violent Education & Action	5. Recently PTA firefighters have been in the news about inadequate facilities at PTA. OSHA complaints. Fires occur at PTA. Is PTA contaminated with PFAS cancer causing fire foam?	Section 3.16.4 has been revised with additional information from DOD Instruction 6055.06, DoD Fire and Emergency Services Program, and the PTA Integrated Wildland Fire Management Plan regarding PTA's fire department requirements, training, and capabilities. This section has also been updated to note that PFAS has not been used at PTA to combat wildland fires. Additional PFAS information added to Section 3.5.
Jim Albertini	Malu 'Aina Center For Non-violent Education & Action	Are PTA firefighters properly trained about all the various toxins on PTA?	Section 3.16.4 revised with additional information from DOD Instruction 6055.06, DoD Fire and Emergency Services Program, and the PTA Integrated Wildland Fire Management Plan regarding PTA's fire department requirements, training, and capabilities.
Jim Albertini	Malu 'Aina Center For Non-violent Education & Action	6. Water wells were drilled at PTA in 2013 and hit water at a shallow depth --700 and 1200 feet respectively in 2 wells byt PTA continues to spend \$2 million annually to haul water going on 10 years after the well drilling. Why isn't the well water being used?	Section 3.9.4 of the EIS describes the research undertaken in 2012 and 2017 to improve the understanding of the County of Hawaii's groundwater system. The study was done for the County of Hawai'i; the County's future water development plans are not know to the Army. There are no groundwater wells in or near the State-owned land. Groundwater extraction from State-owned land at PTA is not proposed or foreseen as part of the Proposed Action.
Jim Albertini	Malu 'Aina Center For Non-violent Education & Action	What toxins from PTA are in the water?	There are no groundwater wells in or near the State-owned land, so no data is available for the PTA area (other than information for the Waiki'i Ranch production well in EIS Section 3.9). Groundwater and surface water quality are discussed in Section 3.9 of the EIS. Section 3.9.4.6 has been added to the EIS and documents the existing management measures utilized by the Army to protect water resources.
Jim Albertini	Malu 'Aina Center For Non-violent Education & Action	7. In a military land report, it was noted that PTA wants to relocate endangered species OUTSIDE of PTA so it doesn't interfere with its live fire training.	Thank you for your comment. The Army is not aware of the referenced "military land report" and therefore cannot comment on this matter.
Jim Albertini	Malu 'Aina Center For Non-violent Education & Action	Also in over 60 years only about half of PTA has been investigated for cultural and historic sites. If you don't look you won't find.	EIS Section 3.4.4.3 has been revised to describe why certain areas have not been surveyed. Figures have been added to show where surveys have been completed and the general locations and types of sites within state-owned lands.  Section 3.1.4 of the EIS describes the methodology for analysis; for each resource area, specific significance criteria are presented. These are standards or thresholds by which a significance conclusion can be drawn. Section 3.4.6 presents the findings of the analysis.
Jim Albertini	Malu 'Aina Center For Non-violent Education & Action	It appears that the military approach to endangered species and cultural sites is the same. They will only interfere with military training. It also should be noted that the entire area of PTA is a conservation district. How do you justify bombing a conservation district?	Section 3.2.4 of the EIS describes that military activities on State-owned land were authorized by the 1964 lease with the State. Conservation District rules, enacted following the lease, considers uses prior to October 1, 1964 as nonconforming. The 1964 lease has been included as Appendix F.  The EIS has been revised to list the standard operating procedures (SOPs), best management practices (BMPs), and regulatory requirements the Army follows during training to protect the natural and cultural resources of the State-owned land.
Jim Albertini	Malu 'Aina Center For Non-violent Education & Action	8. Concerning Depleted Uranium (DU). The draft EIS low balls the number of Davy Crockett spotting rounds fired at PTA. It lists 400 spotting rounds, when Col. Howard Killian testified before the Hawaii county council that based on the number of people certified to fired the Davy Crockett at PTA, the figure is likely 2000 spotting rounds fired. In addition, there could be a lot more DU at PTA than simply Davy Crockett spotting rounds. It is widely known that DU was used wherever ballast (weight) was needed. DU was even used in dummy warheads fired from Vandenberg AF base in California into the Kwajalin Lagoon in the Marshall Islands of Micronesia. Talk about adding insult to injury. The US testified 67 atomic and hydrogen bombs in the Marshall Islands and then sends Depleted Uranium radioactive waste into their lagoon on top of that. The US simply has no shame. DU has been used in a wide range of things, not just dummy warheads, but armor in tanks, etc. Do old tank targets at PTA contain DU too?	Section 3.5.4.12 of the EIS expanded with additional information about depleted uranium and associated studies at PTA (i.e., archival research, site reconnaissance, radiological instrumentation, soil sample results).  Section 3.5.4.12 revised to clarify that depleted uranium-containing/coated munitions are no longer authorized for use in Hawaii and the only depleted uranium-containing/coated munition used at PTA was the Davy Crockett M101 spotting round, which was used between 1962 and 1968.  Section 3.5.4.12 revised to state that based on extensive archival research, only 716 Davy Crockett M101 spotting rounds were allocated to Hawaii. Additionally, based on the archival research and field surveys, up to 400 depleted uranium spotting rounds were fired at PTA.

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Jim Albertini	Malu 'Aina Center For Non-violent Education & Action	9. CLEAN UP! The military needs to clean up not simply all of the leased land at PTA, including the many firing points, but the impact area too of those firing points. This clean up needs to be completed before the lease expires in 2029 and guaranteed federal funds to do the job need to be set aside in the \$800 + Billion annual US military budget. There are lots of other military sites on Hawaii Island and throughout all of Hawaii that still need to be cleaned up too. The military is notorious for NOT cleaning up after itself.	In accordance with the lease and under the provisions of existing law, the Army retains responsibility for cleanup and restoration of former training areas. After the lease expires, if deemed necessary, the Army would follow Army regulations to determine how and when the cleanup and restoration of State-owned land not retained would occur, following the CERCLA process.
Jim Albertini	Malu 'Aina Center For Non-violent Education & Action	<p>Additional testimony on Pohakuloa draft EIS concerning State leased lands June 4, 2022 Army Training Land Retention at Pōhakuloa Training Area Draft Environmental Impact Statement 1-9</p> <p>The PTA Mission PTA provides a quality joint/ combined arms facility that provides logistics, public works, airfield support, and environmental and cultural stewardship in support of the USARPAC training strategy, while maintaining an enduring partnership with the Hawai'i Island community</p> <p>1. Please explain how over decades Pohakuloa's bombing of the land with tens, if not, hundreds of millions of live rounds and a wide variety of long lasting toxins, constitutes "ENVIRONMENTAL AND CULTURAL STEWARDSHIP" and AN ENDURING PARTNERSHIP WITH THE HAWAI'I ISLAND COMMUNITY." In truth, the US military has turned Hawaii Island into am massive Toxic Waste Dump, including Depleted Uranium (DU) radiation contamination. The Pohakuloa Training Area, is really the Pohakuloa Toxic Area (PTA) in the center of Hawaii Island. The area has been bombed and abused by all branches of the US military and other nations military's for more than 70 years. Everyone of the island lives downhill, downwind, and downstream from this PTA toxic stew located at 6500 feet elevation. Retired Kona nuclear geologist, Dr. Mike Reimer, PhD has given profound PTA draft EIS testimony on the toxins at PTA, especially concerning the toxic nature of DU oxide particles. Dr. Reimer, like me, supports the NO action alternative -- no lease renewal.</p>	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Jim Albertini	Malu 'Aina Center For Non-violent Education & Action	2. Is it true that at least one former military "Burn pit" is located on State leased lands? Please identify the locations of all "burn pits at PTA. Has there been any independent investigation to determine the toxic content of such burn pits and clean up costs? In addition to unexploded ordnance (UXO) and other toxins at PTA.	There are no burn pits at PTA. Section 3.5 addresses investigations of hazardous substances and hazardous wastes within the State-owned land.
Jim Albertini	Malu 'Aina Center For Non-violent Education & Action	3. The above point on "Burn pits" underscores the need for a comprehensive EIS on the entire 133,000-acres of PTA not simply the 23,000-acres of leased land. All the acreage is connected in the mission of a live-fire training area. The firing points are connected to the impact area. An analogy would be Auschwitz Nazi Death camp only doing an EIS on the children's playground and dormitory and ignoring the gas death chambers and crematoria of over 1 million bodies in the camp. See May 27, 2022 Hilo Peace Vigil leaflet below entitled "Auschwitz and Pohakuloa -- Family Camps? Don't be Bamboozled!	<p>The EIS analyzes impacts of continued use of the State-owned land retained and end of ongoing activities on the State-owned land not retained.</p> <p>In accordance with the lease and under the provisions of existing law, the Army retains responsibility for cleanup and restoration of former training areas. After the lease expires, if deemed necessary, the Army would follow Army regulations to determine how and when the cleanup and restoration of State-owned land not retained would occur, following the CERCLA process.</p>

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Jim Albertini	Malu 'Aina Center For Non-violent Education & Action	<p>Auschwitz &amp; Pohakuloa -- Family Camps? Let's be clear. Auschwitz was NO Family Camp! Auschwitz was a WWII Nazi concentration and extermination camp located in southern Poland where more than 1 million people, mainly Jews -- men, women and children were killed in gas chambers. Yet in the German Nazi war crime trials in the early 1960s, one former SS guard assured the court there were no attempted escapes. Who would want to escape? Auschwitz, he said, was after all, "a family camp." Another defendant said he could point on a map to where he had made "a children's playground with sandboxes for the little ones." Auschwitz was just one of several WWII German concentration camps where a total of 6 million people, mainly Jews, were exterminated. (See the book Thomas Merton on Peace for his essay Auschwitz: A Family Camp) The Pohakuloa Training Area (PTA) is No Family Camp either. Despite events like the recent "Experience Pohakuloa" Day which tried to portray a warm image with "educational displays highlighting our cultural and natural resources, plenty of keiki activities," etc. The event was described on the PTA Facebook page as a "festive and enjoyable atmosphere for all those who attended." Despite such images, the reality of Pohakuloa is that of a massive 133,000-acre US military toxic training ground for war, including nuclear war. A nuclear war would likely result in the extermination of human civilization on the planet.</p>	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Jim Albertini	Malu 'Aina Center For Non-violent Education & Action	<p>Nuclear weapon spotting rounds containing Depleted Uranium (DU) radiation have been fired at PTA. There have also been reports of nuclear weapons actually exploded at PTA decades ago. Soil tests for Strontium 90 and Cesium 137 in the Impact area could confirm or deny such reports, but access to the impact area is restricted. What we do know is that millions of live-rounds from a wide range of toxic weapon systems by all branches of the military are fired annually at PTA. B-52 and B-2 strategic nuclear bombers fly non-stop from Missouri, Louisiana and Guam to practice bombing Pohakuloa and return to their bases without ever touching down. The US military is the largest institutional consumer of oil and the largest emitter of CO2 on the planet. Putting an end to war and ending the climate crisis go together. The deadline to comment on the extension of State lease lands at PTA is June 7, 2022. For ways to comment see <a href="https://malu-aina.org/?p=8003">https://malu-aina.org/?p=8003</a> Cancel PTA Lease Now! Aloha 'Aina – Stop Bombing Pohakuloa! End the Illegal US Occupation of Hawaii! 1. Mourn all victims of violence. 2. Reject violence &amp; war as solutions. 3. Defend civil liberties. 4. Oppose all discrimination, anti-Islamic, anti-Semitic, anti-Hawaiian, anti-Black, anti-Asian, anti-Russian, etc. 5. Seek peace through peaceful means and work for justice in Hawai'i and around the world. Malu 'Aina Center for Non-violent Education &amp; Action P.O. Box 489 Ola'a (Kurtistown), Hawai'i 96760 Phone (808) 966-7622 Email <a href="mailto:ja@malu-aina.org">ja@malu-aina.org</a> to receive our posts. For more information <a href="http://www.malu-aina.org/">http://www.malu-aina.org/</a> May 27, 2022, Hilo Peace Vigil leaflet – week 1078– Fridays 3:30-5PM downtown Post Office</p>	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Jim Albertini	Malu 'Aina Center For Non-violent Education & Action	<p>All of the above and my other submitted comments on the Draft EIS for Pohakuloa explain reasons why I support the NO ACTION ALTERNATIVE BECAUSE I BELIEVE PTA HAS A WIDE RANGE OF SIGNIFICANT ADVERSE IMPACTS TO AIR, LAND, WATER, CULTURE, PEOPLE, PLANTS AND ANIMALS FROM ITS LONG LASTING EFFECTS AND LONG HISTORY OF ABUSE OF THE SACRED AINA.</p>	Thank you for your sharing your concerns. The Army understands its responsibilities for proper stewardship of the land and has the utmost respect for Native Hawaiians. Please see Sections 3.3, 3.4, 3.6, 3.9, and 3.10 of the EIS for information on biological resources, cultural resources, air quality, water resources,, and socioeconomic impacts.

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Jim Albertini	Malu 'Aina Center for Non-violent Education in Action	<p>Still waiting for answers to questions below. Please make a part of the official record. Mahalo. An open letter to all County, State, Federal officials, and special interests participating in the closed door meeting at the military's Pohakuloa Training Area (PTA) on Feb. 24, 2010. (To people invited to Pohakuloa from those who aren't) Please be aware that the meeting will be picketed. We do not believe in "democracy by invitation only." The doors are closed to the public who pays the bill. We are angry that the military continues to conduct bombing missions and live-fire without a complete independent assessment of the Depleted Uranium (DU) radiation present at PTA as called for in County of Hawaii resolution 639-08. The military has been stonewalling the community's concerns about health and safety for years. The Davy Crockett DU weapons may just be the tip of far more widespread DU contamination. We invite you to stop and dialog with us before you enter the base. Inside, we ask that you be our voice. Ask the following questions and ... PLEASE GET ANSWERS!</p>	<p>The Army makes every effort to be a good neighbor and steward of the environment; however, Hawaii County Council resolutions express policy or opinions and therefore are not compulsory to the federal government.</p> <p>Depleted uranium is discussed in Sections 3.5 and 3.6 of the EIS.</p> <p>Section 3.5.4.12 expanded with additional information about depleted uranium and associated studies at PTA (i.e., archival research, site reconnaissance, radiological instrumentation, soil sample results).</p>
Jim Albertini	Malu 'Aina Center for Non-violent Education in Action	<p>1. Why hasn't the Army stopped all live-fire and bombing missions until there is a complete independent assessment and clean-up of the DU already present as called for in County of Hawaii resolution 639-08?</p> <p>The Army denied even having DU in Hawai'i--until citizen groups found out DU had been discovered at Schofield Barracks, Oahu, in 2005. Estimates of the number of DU spotting rounds vary widely--from about 700 statewide to over 2000 at Pohakuloa alone just from one weapon system --Davy Crockett. (There may have been many more DU weapon systems used at PTA and other Hawaii ranges.) Concerns about Army searches, reports, and air monitoring have been raised by Dr. Mike Reimer, a geologist, and Dr. Marshall Blann, a consultant to Los Alamos National Laboratory, both from Kona; and Dr. Lorrin Pang from Maui, a former Army doctor who is a consultant to the World Health Organization.</p> <p>The Nuclear Regulatory Commission has not yet granted the Army a license to possess DU. Yet the Army has ignored a County resolution calling for a halt to bombing and live-fire that may spread airborne DU from undetected DU munitions.</p>	<p>The presence of depleted uranium at Schofield Barracks is outside the scope of the PTA EIS.</p> <p>Depleted uranium is discussed in Sections 3.5 and 3.6 of the EIS. As noted in Section 3.5.4.12, the NRC issued a license to PTA in 2013 for possession of depleted uranium related to former training with the Davy Crockett Weapons System.</p> <p>The Army makes every effort to be a good neighbor and steward of the environment; however, Hawaii County Council resolutions express policy or opinions and therefore are not compulsory to the federal government.</p> <p>Section 3.5.4.12 revised to clarify that the State-owned land only includes one depleted uranium firing location, the State-owned land does not include the four depleted uranium impact locations, and surveys did not identify any depleted uranium-containing materials on the State-owned land.</p> <p>Section 3.5.4.12 notes that the Army completed a 1-year airborne uranium monitoring program in 2009 to determine if depleted uranium has impacted local air quality. Total airborne uranium levels collected from 210 air samples at PTA were within the range of naturally occurring uranium in Hawaiian soils and rock and were several orders of magnitude below the U.S. and international chemical and radiological health guidelines; therefore, the depleted uranium has not impacted local air quality.</p> <p>Section 3.5.4.12 expanded with additional information about depleted uranium and associated studies at PTA (i.e., archival research, site reconnaissance, radiological instrumentation, soil sample results).</p>
Jim Albertini	Malu 'Aina Center for Non-violent Education in Action	<p>2. Are there more forgotten hazards? The Army claims it was unaware of the Davy Crockett DU spotting rounds because they were classified. This should be a wake-up call to investigate for more DU rounds and other forgotten hazards. Remember that the Army tested nerve gas and defoliants on State lands in the Waiakea Forest Reserve (Hilo's watershed) in 1966 and 1967 while publicly denying such testing. The Army lied. It said it was doing "weather" testing. The State canceled the military lease over the lies and attempted cover-up. Isn't it time to cancel the State lease to the military of stolen Hawaiian Kingdom lands now contaminated with radiation from weapons testing? Military use of Hawai'i Kingdom lands violates the Kingdom's position of neutrality stated in numerous treaties.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

## Responses to Draft EIS Comments

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Jim Albertini	Malu 'Aina Center for Non-violent Education in Action	<p>3. Why is there plenty of money for new military projects, but little to clean up the 50-plus former military sites on Hawai'i Island littered with unexploded ordnance, toxins, and other hazards? When will all of the 50-plus present and former military sites, totaling more than 250,000-acres on Hawaii Island, be cleared of unexploded ordnance, toxins, and other hazards? A few examples... Students dug up a grenade in a school garden in the Waimea/ Waikoloa area. Old ordnance was found twice in 15 months at Hapuna, some in water as shallow as 30 feet, some only about 100 yards from shore. A recreational diver found unexploded ordnance in Hilo Bay--searchers then found 300 pieces Another diver found a 60-millimeter shell at a popular Hilo dive site, about 50 yards offshore in 12 feet of water. 4. Why won't the military participate in public forums on community concerns about health and safety over depleted uranium and other military toxins? What's the Army afraid of? 5. The cumulative impacts from numerous military projects in Hawai'i need to be fully addressed. About 1 acre out of 25 statewide is already military-controlled. Thousands of acres of past and present military sites, Stryker land grab, Hilo National Guard rebuild, University military research, armed "Superferry"/Joint High Speed Vessel---what's next? There are rumors the military wants more of Hawai'i Island. How much Hawai'i Island land is the military planning to take? Where and when?</p>	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Jim Albertini	Malu 'Aina Center for Non-violent Education in Action	<p>6. When will the Pohakuloa Community Advisory Group (CoAG) meet? It hasn't met for seven months. The Army never answered a CoAG member request to restart meetings. Note that the Army only started CoAG a year and a half ago--five years after Sierra Club first asked for such a group. 7. Why are no public scoping hearings planned for the Army's Joint High Speed Vessel EIS? Citizens should be able to publicly raise concerns for the JHSV Environmental Impact Statement--like Risks to marine animals from vessel strikes, fuel spills, and live-fire Risks of spreading coquis, fire ants, and other invasive species Effects of security zones on native Hawaiian cultural practices and subsistence activities, and on fishing, commerce, and recreation Vagueness about which ports will be used 8. We want Military Clean-Up NOT Military Build-Up! If the U.S. stopped spending several \$billion/per day on imperial wars there would be more money for county and state budget needs, jobs, and funding human needs. We urgently request that you--as public officials--speak up on these critical issues of War, Militarism and the Health of our island citizens. With gratitude and aloha, Jim Albertini for Malu 'Aina ohana</p>	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.

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Hanalei Fergerstrom	Na Kupuna Moku O Keawe	<p>I am Hanalei Fergerstrom. I'm the spokesperson for Na Kupuna Moku O Keawe, which is a grouping of Kupuna from all six districts of this island. I want to register a few complaints right off the bat so you understand where we're come from. First of all, your documentation and your call-out for comments are only here. Why? Everybody in the islands are concerned about what the military is doing in the islands . Why are we second to like? We don't know what's going on in Kauai and the radars. Why? Because you keep separating us like we're different people. We're the same ohana. Okay? That's something that you really have got to get in your head, because it makes your efforts almost look stupid. Like you can't see around you.</p> <p>There is another one I want to put in here, and I have said this many times before. In public law 103-50, which is the apology bill, there is a statement in there that's very important, and it says that the Hawaiians are intrinsically tied to the land. Being intrinsically tied to the land, you might as well call us the aina. So when you make a separation of the culture and the people, you have dismissed me. I don't prefer to be dismissed, like you wouldn't prefer to be dismissed.</p> <p>The next thing is an EIS that you created is only partial. By your own admittance you can't even go to a lot of the areas that are on your EIS, so how did you create one? How can you call it a complete EIS if you can't even, your own self testified that you have been through every place up there.</p>	<p>Land tenure and the Apology Resolution are discussed in Section 3.2 of the EIS.</p>
	Na Kupuna Moku O Keawe	<p>And why don't we know about the wells? Okay. There is a lot of well digging that's going on on Punahou site. We know about it.</p> <p>Because you are tapping into sacred waterways that the Hawaiians have been holding on to for hundreds and hundreds of year, without any permission, without any disregard for anybody below you. In case you haven't figured it out yet, everything goes downhill. So if you are on top of the mountains everything that you are going to do is going to come down to the people and to where we are and where the ocean is, and that's where our life starts. It's all about water.</p>	<p>Section 3.9 of the EIS utilizes results of groundwater research conducted in the 1960s and between 2010 and 2017 to disclose what is known about groundwater in the area. As the EIS notes, groundwater has never been extracted from aquifers underlying the State-owned land at PTA. Groundwater extraction from State-owned land at PTA is not proposed or foreseen as part of the Proposed Action.</p>

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	Na Kupuna Moku O Keawe	<p>I don't know how many times we have to do these things because we keep on -- pardon my language -- jacking off. We're kind of like just beating our meat on the side. We are never getting to the point. That's the first point we've got to get to is what the hell are you doing in my country? Who are you to be in my country? I am Hanalei Fergerstrom. I am of the royal lineage. You want to challenge me on that, please, please, provide me the opportunity to bring my case forward, because every time I have tried so far I have been knocked out. Not even given the opportunity to stand up for my basic rights. You have more rights here than I do. How is that? And I am this island. I am the aina. These things are really hard because you give us three minutes to come up with a couple hundred years of stuff. Right? A little silly, huh? I think it's silly, too, and I think you think it's silly, too, because even with a three minute talk, I mean, who is going to retain what? And when are the minutes, the minutes of these meetings coming out? Five or six months down the line? When everybody has completely forgot what we talked about? This is how you keep getting away with stuff. But you have to understand that we know who you are, you know who you are, and I'm telling you you are all complicit to this whole scheme that's going on here. We would like you to be better. We're offering you a chance to be better. Recognize that you are in the Kingdom of Hawai'i. United States has no local authority to assert their jurisdiction in our kingdom at all. Anybody want to challenge me on that, please do. Please do, because I will challenge anybody. And I hate to take it to a front line, but it looks like we're getting there. So know that when we meet again, if it's going to be a front line action, it's going to be an international affair, because you are in my kingdom. We are recognized independent nation state. The same as United States is. No greater and no less than. Thank you very much.</p>	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
	Na Kupuna Moku o Keawe	<p>Aloha, I'm Hanalei Fergerstrom. I want to cap this off with just a simple understanding of law. Okay? It is not a secret, it is not my opinion, but this is an illegal occupation by the United States military. So when you have things like executive orders from your commander, your president, you have to ask yourself, does he have a jurisdiction here? Now, you need to understand this, because that's the same kind of questions you have to answer to your own people. What jurisdiction do you have? Your whole base is based on an executive order by the governor. Does he have any jurisdiction here? No. We've got to stop playing these stupid games of who is right and who is wrong. Let's just look at history. It's very clarified there. What are we going to do about it? That's the point that needs to be made. Because I can tell you, I have a dream that's so big that includes all of you guys, and it has nothing to do with war. Thank you.</p>	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Cory Harden	Sierra Club	Both the proposed action and the EIS analysis raise serious concerns. The EIS should explain how the Army can legally own or use the land although the United States controls Hawai'i illegally. ?	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Cory Harden	Sierra Club	Claims that land retention is necessary are not credible, since the military also claimed Kaho'olawe, the Kapūkakāī (Red Hill) fuel tanks, and Stykers were necessary. ?	The purpose and need for the Proposed Action are discussed in Section 1.3 of the EIS.
Cory Harden	Sierra Club	The EIS should describe how the State can meet fiduciary obligations to native Hawaiians and the public to protect the land, if it is retained, since the Army is a bad actor that has left the land in degraded and hazardous condition, at P?hakuloa and other sites. The EIS should include a plan and commitment to cleaning up debris and toxins before the lease expires. ?	<p>The State's compliance with its fiduciary responsibilities and trust obligations is beyond the scope of the EIS.</p> <p>In accordance with the lease and under the provisions of existing law, the Army retains responsibility for cleanup and restoration of former training areas. After the lease expires, if deemed necessary, the Army would follow Army regulations to determine how and when the cleanup and restoration of State-owned land not retained would occur, following the CERCLA process.</p>

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Cory Harden	Sierra Club	The EIS should explain how military use is allowable in a conservation district. ?	Section 3.2.4 of the EIS describes that military activities on State-owned land were authorized by the 1964 lease with the State. Lawful use established prior to October 1, 1964 are considered nonconforming under the conservation district rules, which were enacted following the lease.
Cory Harden	Sierra Club	The EIS should explain why the Army sited critical infrastructure on land with a temporary lease.	10 U.S.C. Section 2852, Military Construction Projects: Waiver of Certain Restrictions, and AR 405-10, Acquisition of Real Property and Interests Therein, specify that to carry out military improvements or modernization efforts, a long-term interest (i.e., 25 years) in the land must be acquired. Infrastructure is developed based on where soil is present. The Army sited the infrastructure within these parameters.
Cory Harden	Sierra Club	Impacts to native species should be described, as well as impacts from invasive species and the success of past control methods.	Native species are discussed in Section 3.3.4.3 and 3.3.4.4, invasive species are discussed in Section 3.3.4.3 and 3.3.4.4, and impacts to protected and native species are discussed in Section 3.3.6. Text within these sections has been revised and expanded to include natural resource management measures that the Army is implementing that benefit the land and protected species.
Cory Harden	Sierra Club	Cultural resource data is insufficient to support EIS conclusions: archaeological surveys have only been done on about half of the State land, no valid survey has been done since 2013 ?	EIS Section 3.4.4.3 has been revised to describe why certain areas have not been surveyed. Figures have been added to show where surveys have been completed and the general locations and types of sites within state-owned lands.  Section 3.1.4 of the EIS describes the methodology for analysis; for each resource area, specific significance criteria are presented. These are standards or thresholds by which a significance conclusion can be drawn. Section 3.4.6 presents the findings of the analysis.
Cory Harden	Sierra Club	The sole ethnographic study failed to use Hawaiian language resources. The Cultural Resources Management Program has been hampered by lack of training, technical issues, inadequate facilities, and project delays. There are few specifics on how the Army will remedy the lack of access, which is still a problem after five decades on the lease, and impacts many cultural practices. ?	Section 3.4.2.1 ("Evaluation of Traditional and Cultural Properties Under NHPA"), clarifies that this EIS complies with the requirements of NEPA and HEPA and does not address compliance requirements under NHPA or HRS Chapter 6E.
Cory Harden	Sierra Club	For environmental, archaeological, and cultural studies the Army often claims it is too dangerous to go into the impact area. But personnel went in to check for depleted uranium, and even did construction in the impact area for a new training range Studies and monitoring cited by the EIS for depleted uranium are inadequate. ?	Entry into the impact area, which is not State-owned land, is outside the scope of the EIS.  The Army executed a programmatic agreement with the State Historic Preservation Officer and the Advisory Council on Historic Preservation in 2018. The programmatic agreement resolves adverse effects to historic and cultural resources that may result from ongoing routine military training actions and related activities at PTA, including those activities on the State-owned land.  Section 3.5.4.12 expanded with additional information about depleted uranium and associated studies at PTA (i.e., archival research, site reconnaissance, radiological instrumentation, soil sample results).
Cory Harden	Sierra Club	A full analysis of greenhouse gas emissions is needed, but is not even attempted.	Section 3.6.2 explains why a quantitative, full life-cycle analysis of greenhouse gases has not been performed. The EIS includes a qualitative analysis of greenhouse gas emissions.
Cory Harden	Sierra Club	There is inadequate analysis of noise that can be heard miles away, and of concussions that can affect travelers on Saddle Road. ?	The best available data for noise analysis was incorporated into this EIS. A 2020 noise study is discussed in Section 3.7.4 and analyzed in Section 3.7.6.
Cory Harden	Sierra Club	Socioeconomic analysis should include the cost of cleanup of the impact area and the rest of the base after base closure, and the cost of lost opportunities for other uses of the land, such as: a park that preserves cultural resources, educates the public about history and culture, and allows outdoor activities; agricultural uses that provide food and building materials locally; raising of livestock., etc.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Cory Harden	Sierra Club	Impacts to traffic and road wear are inadequately addressed for convoys every 2 to 4 weeks, plus trucks for water, fuel, and other supplies.	Section 3.12.3 has been revised with the most updated available information.
Cory Harden	Sierra Club	Analysis of fire impacts fails to mention serious concerns about staffing and equipment, and the history of several past fires. ?	Section 3.16.4 has been updated to include impacts from recent wildland fires.

## Responses to Draft EIS Comments

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Cory Harden	Sierra Club	Long-term impacts beyond the base's borders are only considered for training, but should also be considered for the environment. Cumulative impact analysis should include a list of all current and former military sites on Hawai'i Island, with their cleanup status. It should also evaluate the impacts of future pumping for the training area from groundwater that has minimal recharge.	Cumulative impacts, as described in Chapter 4 of the EIS, are assessed for the Region of Influence (ROI) described for each resource in Chapter 3. Cumulative impacts consider reasonably foreseeable actions within the ROI, as defined in Chapter 4. Other military sites on the island of Hawai'i are outside the ROI of PTA resources and are therefore not included. Groundwater extraction is not reasonably foreseeable on State-owned land and is therefore not included. Environmental impacts to water resources are discussed in Section 3.9 of the EIS.
Cory Harden	Sierra Club	The preferred alternative should be specified. A legal basis should be given for treating certain comments as "not substantive".	The Army's preferred alternative is identified in the Second Draft EIS.
Cory Harden	Sierra Club	Give reasons why claims that the military must have this land are credible, given that the military also claimed it could not manage without Kaho'olawe, Kapūkākī (Red Hill) fuel storage, and Strykers.	The purpose and need for the Proposed Action are discussed in Section 1.3 of the EIS.
Cory Harden	Sierra Club	Explain the rationale for siting "critical facilities" on the State land though there was no guarantee of retaining it after 65 years and a directive prohibiting "improvements or modernization efforts" in the last 25 years of the lease. Was there an intent to create political pressure to allow retention?	10 U.S.C. Section 2852, Military Construction Projects: Waiver of Certain Restrictions, and AR 405-10, Acquisition of Real Property and Interests Therein, specify that to carry out military improvements or modernization efforts, a long-term interest (i.e., 25 years) in the land must be acquired. Infrastructure is developed based on where soil is present. The Army sited the infrastructure within these parameters.
Cory Harden	Sierra Club	Hawai'i Administrative Rules Chapter 13-5 Conservation District Rules The region including and surrounding PTA was included in the conservation district. The lease for Army use of State-owned land was signed in August 1964, prior to the enactment of HRS Chapter 183C. Per the statute and its enacting rule, HAR Chapter 13-5, Conservation District, lawful use of land prior to October 1, 1964, is considered nonconforming... Military use is not included as an allowable use for any conservation district subzone. HAR Chapter 13-5 provides for authorization of additional uses through discretionary permits from the State Board of Land and Natural Resources (BLNR). Any request for a permit would follow the EIS process and determination of the land retention estate(s) and method(s)... p. 1-17 See comments re. 3.2.4.1 Land Tenure; State Land Use Districts.	The EIS has been revised to list the standard operating procedures (SOPs), best management practices (BMPs), and regulatory requirements the Army follows during training to protect the natural and cultural resources of the State-owned land. The Army's adherence to federal regulations is evident and in alignment with the purposes of the Conservation District.  EIS Section 1.4.2 has been refined to describe the administrative processes to use of the State-owned land.
Cory Harden	Sierra Club	1.6 Public Participation 1.6.2 Scoping For this EIS, comments that help refine the Proposed Action or alternatives; identify specific resource analysis to be conducted in the EIS (e.g., cultural resources, biological resources, hazardous waste); and/or recommend technical data, specific impacts or mitigation measures were considered substantive. Statements considered to not be substantive were general comments with no specific information, such as those that stated preferences for or against the Proposed Action, military, or Army in Hawai'i. p. 1-21 Cite the legal basis for this refusal to even consider certain comments. If large numbers of commenters strongly support or oppose the Proposed Action, military, or Army in Hawai'i, that is significant. Those comments should be reported in the Final EIS. ?	Section 1.6.2 notes that, in determining whether a comment is substantive, the EIS preparer "... shall consider the validity, significance and relevance of the comment to the scope, analysis or process of the EIS (HAR Section 11-200.2-26[a])." For this EIS, comments that help refine the Proposed Action or alternatives; identify specific resource analysis to be conducted in the EIS (e.g., cultural resources, biological resources, hazardous waste); and/or recommend technical data, specific impacts or mitigation measures were considered substantive. Statements considered to not be substantive were general comments with no specific information, such as those that stated preferences for or against the Proposed Action, military, or Army in Hawai'i.
Cory Harden	Sierra Club	2.2 Alternatives Considered p. 2-7 The EIS should analyze impacts under ownership, lease, easement, and license for Alternatives 1, 2, and 3, since each form of control over the land entails different levels of oversight and restriction. ?	Section 2.3 revised to clarify there would be no difference in ongoing activities on the State-owned land retained under the land retention estates selected for analysis (i.e., fee simple title, lease, easement). The only difference is that under lease and easement the Army would adhere to lease/easement conditions, assumed Army obligations in the Court Ordered Management Plan, and applicable State processes/administrative requirements. Because ongoing activities, lease/easement conditions, assumed Army obligations in the Court Ordered Management Plan, and applicable State processes/administrative requirements would be the same under lease and easement, the impacts for lease and easement would be the same; therefore, the EIS only analyzes fee simple title and lease.
Cory Harden	Sierra Club	2.4 Preferred Alternative The Preferred Alternative [ownership, lease, easement, or license] will be identified in the Final EIS. The Preferred Alternative should be identified and analyzed in the Draft	The Army's preferred alternative is identified in the Second Draft EIS.
Cory Harden	Sierra Club	3.1 Introduction 3.1.4 Analysis Methodology Region of Influence For impacts to the environment, the EIS limits consideration to the immediate action. But for impacts to training if the land is not retained, the EIS extends consideration to long-term impacts extending far beyond the borders of the base. Impacts to the environment should receive the same type and level of consideration. ?	The scope of analysis may vary by the nature of the resource element and the anticipated direct and indirect impacts from the Army actions.

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Cory Harden	Sierra Club	When Hawai'i was admitted into the Union as a state in 1959, these ceded lands were transferred back to the newly established state, subject to the trust provisions set forth in section 5(f) of the Admission Act. Pele Def. Fund, 73 Haw. at 585, 837 P.2d at 1254 (citing Hawaii Admission Act, Pub. L. No. 86-3, 73 Stat. 4, 6 (1959)). Article XII, section 4 was later added to the Hawai'i Constitution to formally recognize these responsibilities, specifying that the land "shall be held by the State as a public trust for native Hawaiians and the general public." 47 Id. at 586, 837 P.2d at 1254 (quoting Haw. Const. art. XII, § 4).	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Cory Harden	Sierra Club	At that same time, the framers and the people of Hawai'i adopted article XI, section 1, which created a public trust consisting of "all public natural resources" to be administered by the State for the benefit of the people.48 Haw. Const. art. XI, § 1. 47 As the State concedes, our case law and the common law of trusts make the State "subject to certain general trust duties, such as a general duty to preserve trust property." See, e.g., Zimring, 58 Haw. at 121, 566 P.2d at 735 ("Under public trust principles, the State as trustee has the duty to protect and maintain the trust property and regulate its use."); Kaho'ohanohano v. State, 114 Hawai'i 302, 325, 162 P.3d 696, 719 (2007) ("[It] is always the duty of a trustee to protect the trust property . . . ." (quoting Brenizer v. Supreme Council, Royal Arcanum, 53 S.E. 835, 838 (N.C. 1906)));	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Cory Harden	Sierra Club	In re Estate of Dwight, 67 Haw. 139, 146, 681 P.2d 563, 568 (1984) ("A trustee is under a duty to use the care and skill of a [person] of ordinary prudence to preserve the trust property." (citing Bishop v. Pittman, 33 Haw. 647, 654 (Haw. Terr. 1935)); Restatement (Second) of Trusts § 176 ("The trustee is under a duty to the beneficiary to use reasonable care and skill to preserve the trust property."). 49 As trustee, the State must take an active role in preserving trust property and may not passively allow it to fall into ruin. United States v. White Mt. Apache Tribe, 537 U.S. 465, 475 (2003) ("[E]lementary trust law, after all, confirms the commonsense assumption that a fiduciary actually administering trust property may not allow it to fall into ruin on [the fiduciary's] watch."). Ching v. Case decision, August 23, 2019, SCAP-18-0000432, pp. 73 - 76 <a href="https://www.courts.state.hi.us/wp-content/uploads/2019/08/SCAP-18-0000432.pdf">https://www.courts.state.hi.us/wp-content/uploads/2019/08/SCAP-18-0000432.pdf</a>	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Cory Harden	Sierra Club	3.2.4.1 Land Tenure -Ownership Current laws and legal rulings affirm the State-owned land at PTA was legally transferred to the State. p. 3-7 How could the land could be legally transferred, when the United States controls Hawai'i illegally? "The Congress... apologizes to Native Hawaiians on behalf of the people of the United States for the overthrow of the Kingdom of Hawaii on January 17, 1893 with the participation of agents and citizens of the United States, and the deprivation of the rights of Native Hawaiians to self-determination..." Public Law 103-150—Nov. 23, 1993 <a href="https://www.govinfo.gov/content/pkg/STATUTE-107/pdf/STATUTE-107-Pg1510.pdf">https://www.govinfo.gov/content/pkg/STATUTE-107/pdf/STATUTE-107-Pg1510.pdf</a> Cite any laws and court decisions that demonstrate the land was transferred legally from the nation of Hawai'i; and that the Army has a right to lease the land, buy it, or take it by eminent domain ?	EIS Section 3.2.4.1 explains that the tenure of the State-owned land is based on federal, state, and county laws and classifications. Current laws and legal ruling affirm the State-owned land at PTA was legally transferred to the State. This EIS analysis is based on these legal precedents.
Cory Harden	Sierra Club	State General Lease No. S S-3849 [upon lease expiration] Weapons and shells used in connection with training activities are to be removed to the extent that technical and economic capability exists and provided that expenditure for removal would not exceed the fair market value of the land. p. 3-11 To demonstrate good faith, the EIS should include a commitment to clean up the land, before the lease expires, to its condition before the lease began, although there are laws and lease provisions that would allow no cleanup. The Army should provide specific details and timeline to clearly insure that clean-up would be complete by the end of the lease.	In accordance with the lease and under the provisions of existing law, the Army retains responsibility for cleanup and restoration of former training areas. After the lease expires, if deemed necessary, the Army would follow Army regulations to determine how and when the cleanup and restoration of State-owned land not retained would occur, following the CERCLA process.

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Cory Harden	Sierra Club	State Land Use Districts All of PTA was classified as conservation district under the State’s 1961 Land Use Law. Hawai’i conservation district statute and rules, HRS Chapter 183C and HAR Chapter 13-5, were enacted in 1964. Lawful use of land, established prior to October 1, 1964, is considered nonconforming. The statute and rule define nonconforming as “the lawful use of any building, premises or land for any . . . purposes which is the same as and no greater than that established prior to October 1, 1964 . . .” The lease for military use of the approximately 23,000 acres at PTA was signed on August 16, 1964, and is considered nonconforming per HRS Chapter 183C and HAR Chapter 13-5. p. 3-12 Military use is not defined as an allowable use for any conservation district subzone, but HAR Chapter 13-5 provides for authorization of additional uses and, therefore, allows for conformance with the rules	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Cory Harden	Sierra Club	p. 3-14 Specify how this action will comply with HAR Chapter 13-5, especially 13-5-30 (c): “(c) In evaluating the merits of a proposed land use, the department or board shall apply the following criteria: (1) The proposed land use is consistent with the purpose of the conservation district; (2) The proposed land use is consistent with the objectives of the subzone of the land on which the use will occur; (3) The proposed land use complies with provisions and guidelines contained in chapter 205A, HRS, entitled “Coastal Zone Management” where applicable (4) The proposed land use will not cause substantial adverse impact to existing natural resources within the surrounding area, community or region; (5) The proposed land use, including buildings, structures and facilities, shall be compatible with the locality and surrounding areas, appropriate to the physical conditions and capabilities of the specific parcel or parcels; (6) The existing physical and environmental aspects of the land, such as natural beauty and open space characteristics, will be preserved or improved upon, whichever is applicable; (7) subdivision of land will not be utilized to increase the intensity of land uses in the conservation district; and (8) The proposed land use will not be materially detrimental to the public health, safety and welfare. The applicant shall have the burden of demonstrating that a proposed land use is consistent with the above criteria .” ?	EIS Section 1.4.2 has been refined to describe the administrative processes to use of the State-owned land following additional discussion with OCCL.
Cory Harden	Sierra Club	3.3 Biological Resources Analyze impacts on 'ua'u.	The Hawaiian Petrel is discussed in Section 3.3.4.4, and is believed to be a transient, not a resident, species based on the fact that no nests have been documented on PTA to date. <b>Appendix K</b> discusses monitoring work that the USAG-PTA staff do for this species.
Cory Harden	Sierra Club	Analyze extent and impacts of invasive species (goats, fountain grass, Russian thistle, fireweed, etc). Describe success of past control methods. ?	Invasive species and the work that USAG-PTA staff do to identify and manage them is discussed in Section 3.3.4.3 and 3.3.4.4.
Cory Harden	Sierra Club	3.4.4.3 Previous Cultural Resources Studies Archaeological Investigations Of the approximately 23,000 acres that comprise the State-owned land, approximately 12,050 acres have been subjected to Phase I inventory survey... p. 3-45 Table 3-6 Archaeological Coverage of State-Owned Land at Pōhakuloa Training Area p. 3-48 [most recent survey is 2013] Ethnographic Studies A 2012 ethnographic study was commissioned, completed and accepted by the Army for PTA: “Ethnographic Study of Pohakuloa Training Area and Central Hāmākua District, Island of Hawai’i, State of Hawai’i” (McCoy & Orr, 2012). This is the only ethnographic or TCP study commissioned by the Army for study and/or assessment of TCPs within PTA. The study found “a general lack of information in the literature concerning cultural practices and beliefs related to the Saddle Region, when compared to other, more populated areas of Hawaii.” The study did not use any Hawaiian language resources... Since the McCoy and Orr study, no further studies for TCPs have been conducted at PTA by USAG-HI CRM staff or contractors. p. 3-49 ?	Section 3.4.2.1, (“Evaluation of Traditional and Cultural Properties Under NHPA”) clarifies that this EIS complies with the requirements of NEPA and HEPA and is not intended to address compliance requirements under NHPA or HRS Chapter 6E.

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Cory Harden	Sierra Club	Archaeological surveys have only been done on about half of the State land, no valid survey has been done since 2013, and the sole ethnographic study failed to use Hawaiian language resources. Justify how this limited data is sufficient to support EIS conclusions.	<p>The Proposed Action is an administrative action that does not propose new land uses. Therefore the EIS relies on existing studies that are summarized in an Archaeological Literature Review (Appendix J). Section 3.4 of the EIS summarizes the findings of more than 30 archaeological surveys presented in further detail within Appendix J. There is no requirement under NEPA or HEPA to conduct specific surveys.</p> <p>Over the past 10 years, the Army has spent \$75 million for natural and cultural resource management across its training areas on O’ahu and Hawai’i island. The Army has spent at least \$3M annually for natural and cultural resource management at PTA.</p>
Cory Harden	Sierra Club	3.4.4.5 Current Management Efforts The Army operates a robust CRM [Cultural Resources Management] Program at PTA... p. 3-59 Justify “robust” in light of the problems revealed in the Third Annual Report for Routine Military Training Actions and Related Activities at United States Army Installations on the Island of Hawai’i, Hawai’i, January 1, 2020 through December 31, 2020. Some training was skipped. ... Annual training for RDH [Range Division Headquarters] staff was not conducted during pandemic restrictions but will be conducted in the next reporting period. Report p. 2 ?	Survey, monitoring, and preservation measures are ongoing at PTA. The Army has spent approximately \$3M annually on natural and cultural resource management at PTA.
Cory Harden	Sierra Club	An educational video was still not completed after three years. Report p. 3 It was promised in the Programmatic Agreement: The USAG-P?hakuloa, with support from U.S. Army Training Support Systems, shall, in consultation with the parties listed in Appendix H, produce a short educational video featuring NHO representatives ...Programmatic Agreement, September 25, 2018, D 2 a, p. 18	The Programmatic Agreement educational video is beyond the scope of this EIS.
Cory Harden	Sierra Club	Technical issues derailed a listening session. 2. III.D.2.a. Native Hawaiian Listening Session b. A listening session was planned for November 5, 2020 ... Technical complications with Microsoft Teams prevented unregistered participants from logging into the meeting and as such most invitees were unable to participate. Report p. 4 Office facilities were inadequate for an extended time. The cultural resources office is not connected to the network so the government staff flex between the isolated program office and a computer on a kitchen counter at Headquarters that is connected to a printer. Report p. 6	The listening session is beyond the scope of this EIS.
Cory Harden	Sierra Club	The entire base, including the impact area, needs to be surveyed, before cultural resources are destroyed by training activities. If the Army does not plan to survey, cite legal authority allowing this. Some native Hawaiians report there are numerous undiscovered caves and archaeological sites in the impact area. For environmental, archaeological, and cultural studies the Army often claims it is too dangerous to go there. But they went in to check for depleted uranium, and even did construction in the impact area for a new training range. What criteria are now being used to determine when people can enter?	<p>EIS Section 3.4.4.3 has been revised to describe why certain areas have not been surveyed. Figures have been added to show where surveys have been completed and the general locations and types of sites within state-owned lands.</p> <p>Section 3.1.4 of the EIS describes the methodology for analysis; for each resource area, specific significance criteria are presented. These are standards or thresholds by which a significance conclusion can be drawn. Section 3.4.6 presents the findings of the analysis.</p>
Cory Harden	Sierra Club	3.4.6 Environmental Analysis 3.4.6.1 Alternative 1: Full Retention Traditional and Customary Practices Summary of Impacts: ...The overall impact to traditional and customary practices under Alternative 1 would continue to be significant but mitigable through potential mitigation measures. Potential Mitigation Measures: Through consultation with Native Hawaiians, and/or other ethnic groups as appropriate, provide access to promote and protect cultural beliefs, practices, and resources. Level of Significance: Significant but mitigable. p. 3-64 Explain why access is still a problem after over five decades on the lease. ?	The EIS has been updated to include the Army's ongoing best management practices, standard operating procedures, management measures, and mitigation measures to clarify the Army's efforts to protect cultural and natural resources. Information regarding standardized access procedures for cultural consultation, NAGPRA, and traditional practices is detailed in Section 3.4.4.6 ("Exisitng Management Measures") of the EIS.

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Cory Harden	Sierra Club	Supply a history of requests for access, including which requests were granted, and which requests were denied and why. Describe fully how access will be provided. Include this information from the Cultural Impact Assessment: Eleven cultural practices are "adversely impacted by limitation of access". CIA, Table 25, p. 361 "...the acquisition of lands by foreigners, including the U.S. Military, has caused and continues to cause Hawaiians pain and even trauma...the obligation of the state to ensure that these rights [for traditional or customary access] are protected is much more than a legal obligation, as such rights are a necessity of indigenous human life..." CIA, p. 365	The Army is not required to maintain records or data of public access requests. Information regarding standardized access procedures for cultural consultation, NAGPRA, and traditional practices is detailed in Section 3.4.4.6 ("Existing Management Measures") of the EIS.
Cory Harden	Sierra Club	3.5 Hazardous and Toxic Materials and Wastes 3.5.3 Region of Influence The ROI for hazardous and toxic materials and wastes is the area on and immediately surrounding the State-owned land. p. 3-71 The ROI should include areas through which such materials and wastes are transported, and areas where they are disposed of. ?	Region of Influence for hazardous substances and hazardous wastes revised to include transportation corridors and disposal areas. Hazardous wastes and used hazardous materials and petroleum products are trucked to one of two harbors (Hilo or Kawaihae) and shipped off-island to the U.S. mainland or other areas for recycling, reuse, or disposal, as necessary, in accordance with state and federal regulations.
Cory Harden	Sierra Club	3.5.4.11 Military Munitions and Munitions and Explosives of Concern Despite cleanup efforts, erratic bullets and gun components have been found on the TAs, FPs, and ranges. p. 3-79 Soil sampling has not been performed on all the TAs, [training areas] FPs, [firing points] and ranges to determine the presence or absence of MCs. [munitions constituents] p. 3-79 The Former Bazooka Range, including the High Mortar Concentration Area, is on TA 17 and measures approximately 60 acres... In 2015, the site underwent a surface only cleanup action that removed over 1,000 pounds of visible munitions debris. The debris was heavily concentrated within an 11-acre central location (USACE-POH & USAG-HI, 2017a). Subsurface military munitions have not been addressed. p. 3-79 During the construction of the DKI Highway, subsurface investigations identified MEC including mortars. Therefore, there is a potential for MEC to be found anywhere on the State-owned land . If MEC is discovered, the Army immediately responds and deactivates and removes the item... p. 3-80	In accordance with the lease and under the provisions of existing law, the Army retains responsibility for cleanup and restoration of former training areas. After the lease expires, if deemed necessary, the Army would follow Army regulations to determine how and when the cleanup and restoration of State-owned land not retained would occur, following the CERCLA process.
Cory Harden	Sierra Club	Specify what will be done to clean up all these hazardous and toxic materials before the current lease expires. Retention of the land would allow more firing into the impact area. For years, EISs for Pohakuloa have said the impact area will be cleaned up after the base is closed. But we know Kaho'olawe and other former military sites remain in hazardous condition despite similar promises. Will the Army post a bond to ensure cleanup of the impact area?	<p>In accordance with the lease and under the provisions of existing law, the Army retains responsibility for cleanup and restoration of former training areas. After the lease expires, if deemed necessary, the Army would follow Army regulations to determine how and when the cleanup and restoration of State-owned land not retained would occur, following the CERCLA process.</p> <p>The Army's cleanup efforts after training exercises are discussed in Section 3.5.4.11. Text revised to note that the Army removes or deactivates all live and blank ammunition upon completion of a training exercise in compliance with the lease and removes solid waste prior to departing a training area or range facility in accordance with the U.S. Army Garrison, Pohakuloa (USAG-PTA) External Standard Operating Procedures (2018).</p> <p>The State's obligations to native Hawaiians are outside the scope of the EIS.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Cory Harden	Sierra Club	<p>3.5.4.12 Radioactive Materials Include and evaluate information from the “Independent Review of Pohakuloa Training Area (PTA): Depleted Uranium from the Davey Crockett Weapon System”, attached. Explain why that review, posted about 2008 on the Army “Depleted Uranium in Hawaii” website (<a href="https://home.army.mil/hawaii/index.php/garrison/dpw/du">https://home.army.mil/hawaii/index.php/garrison/dpw/du</a>), has now disappeared from the website. Include and evaluate information from Cory Harden’s May 28, 2013 e-mail to Gary Gill, attached. Address the concerns raised in comments on this EIS by Mike Reimer, a retired geologist who has been communicating his concerns about DU to the Army and Nuclear Regulatory Commission for years. For example, he states that the one test sample for 133,000 acres is grossly inadequate, and risks from inhaled DU oxides, that lodge in the lungs and emit radiation directly into body tissues for years, are not even being considered. ?</p>	<p>"Independent Review of Pohakuloa Training Area (PTA): Depleted Uranium from the Davey Crockett Weapon System" and Harden-Gill email reviewed and relevant information considered for addition to the EIS. The presence or absence of documents on USAG-HI's website is beyond the scope of the EIS.</p> <p>Section 3.5.4.12 of the EIS expanded with additional information about depleted uranium and associated studies at PTA (i.e., archival research, site reconnaissance, radiological instrumentation, soil sample results).</p> <p>Section 3.5.4.12 notes that the Army completed a 1-year airborne uranium monitoring program in 2009 to determine if depleted uranium has impacted local air quality. Total airborne uranium levels collected from 210 air samples at PTA were within the range of naturally occurring uranium in Hawaiian soils and rock and were several orders of magnitude below the U.S. and international chemical and radiological health guidelines; therefore, the depleted uranium has not impacted local air quality.</p>
Cory Harden	Sierra Club	<p>3.6 Air Quality and Greenhouse Gases 3.6.2 Regulatory Framework A quantitative, full life-cycle analysis of GHG emissions (i.e., CO2, methane, and nitrous oxide emissions from direct Army activities on PTA as well as from indirect activities such as manufacturing and shipping equipment and materiel and troop movements to and from PTA) and their associated social costs has not been performed because there are no tools, methodologies, or data inputs reasonably available to support such calculations for a real estate transaction, such as the Proposed Action. p. 3-89 Define “reasonably available”. This analysis must be done to give decision-makers full information.</p>	<p>Section 3.6.2 revised to define "reasonably available."</p>
Cory Harden	Sierra Club	<p>3.6.3 Region of Influence While the effects of climate change are felt worldwide, they differ greatly depending on the region or locality. Therefore, the ROI for the effects of climate change is the island of Hawaii?i. p. 3-89 Since effects are felt worldwide, the ROI should be worldwide. 3.6.4 Existing Conditions Regional Air Quality No monitoring stations are located within PTA, and the nearest air monitoring station is located in Hilo, approximately 25 miles from PTA. p. 3-89 There should be monitoring stations in or near PTA to assess impacts of military operations. Climate Change No new impacts from GHG emissions would occur, but long-term, minor, direct and indirect, adverse impacts from GHGs would continue from activities within the State-owned land...The continued production of identical levels of GHGs would not meaningfully contribute to the potential impacts of global climate change. p. 3-93 Evaluate GHG emissions from all actions that will be enabled by retention of the land.</p>	<p>Analyzing the effects of climate change from a worldwide perspective is not a reasonable methodology because the effects differ by locality.</p> <p>The locations of Hawaii Department of Health air monitoring stations are outside the scope of this EIS.</p>
Cory Harden	Sierra Club	<p>3.7 Noise 3.7.3 Region of Influence The ROI extends into surrounding areas on and around PTA that might be affected by aircraft conducting training on PTA or military munitions noise. p. 3-101 The ROI should include much of the island--residents report hearing explosions as far away as Kurtistown, and having windows rattled in Honoka’a. Concussions should also be analyzed—one resident reported being almost blown off his motorcycle on Saddle Road by the concussion from weapons firing. ?</p>	<p>Analyzing the region of influence from an island-wide perspective is beyond the scope of this EIS.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Cory Harden	Sierra Club	<p>3.9 Water Resources 3.9.2 Regulatory Framework The State-owned land is located above the UIC line indicating that the site overlies a potential drinking water source. p. 3-129 3.9.4 Existing Conditions 3.9.4.1 Groundwater and Watershed Carbon-14 age dating conducted on water retrieved from PTA-2 from the regional high-level aquifer that underlies the saddle area yielded an age of 5,000 years. A similar age of 5,000 years was measured in the groundwater pumped from the Waiki'i well to the northwest... Due to the depth of groundwater beneath the State-owned land and the minimal direct recharge from infiltration of rainfall that falls on the State-owned land, existing impacts to groundwater from training are less than significant. Limited surface water and groundwater pathways on State-owned land pose minor potential impact to soil and groundwater quality (Section 3.5.4). p. 3-134 A number of EISs for P?hakuloa have also claimed minor impacts to groundwater because of its depth. At what depth would impacts from training become significant? The proposed action would enable numerous future actions including removing groundwater for Army use. Since there is “minimal direct recharge”—apparently almost none in 5,000 years-- would Army removal of water deplete the groundwater used by the Army and Waiki'i Ranch, and (in the future) nearby DHHL lands? ?</p>	<p>Groundwater extraction from State-owned land at PTA is not proposed or foreseen as part of the Proposed Action.</p>
Cory Harden	Sierra Club	<p>3.10 Socioeconomics p. 3-140 Include the cost of cleanup of the impact area and the rest of the base after the base is closed. For reference include the cost of cleanup on Koho'olawe—which is not even completely cleaned up. Calculate the cost of lost opportunities for other uses of the land, such as: a park that preserves cultural resources, educates the public about history and culture, and allows outdoor activities; agricultural uses that provide food and building materials locally; raising of livestock., etc.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Cory Harden	Sierra Club	<p>3.11 Environmental Justice 3.11.3 Region of Influence p. 3-151 Analyze impacts to people driving by, hunting, or visiting Mauna Kea Park, and also to people living miles away, who are affected by cultural impacts, as well as by noise and concussions from weapons firing, explosions, aircraft, etc. Air Quality and Greenhouse Gases ...air quality impacts would not adversely affect any populations... p. 3-152 Greenhouse gases generated by military activity affect everyone on Earth through climate change. ?</p>	<p>The environmental justice region of influence is limited to environmental justice populations, not all populations that traverse areas near the Proposed Action. Section 3.11.3 states the environmental justice region of influence includes populations for impacts to cultural resources.</p> <p>Analyzing the effects of climate change from a worldwide perspective is not a reasonable methodology because the effects differ by locality.</p>
Cory Harden	Sierra Club	<p>3.12 Transportation and Traffic            Since 2012, media releases to the public about convoy transport between PTA and Kawaihae Harbor have varied from 11 to 25 releases per year.. p. 3-169            Summary of Impacts: Alternative 1 would result in no new impacts on PTA and regional transportation systems and traffic; however, continued long-term, minor, adverse impacts on PTA and regional transportation systems and traffic would occur due to ongoing activities within the State-owned land.            Potential Mitigation Measures: None recommended.            Level of Significance: Less than significant.            p. 3-175 Provide the criteria and rationale for deciding impacts are less than significant despite a convoy every 2 to 4 weeks. Analyze impacts from vehicles supplying water, fuel, food, equipment, and other supplies. Calculate the cost to the County and State from wear and tear on roads. A resident reported being almost blown off his motorcycle on Saddle Road by the concussion from weapons firing several years ago. Evaluate military hazards to people using various vehicles on Saddle Road, and propose mitigation.</p>	<p>Traffic is analyzed in Section 3.12 of the EIS. Section 3.12.5 of the EIS provides the Methodology and Significance Criteria for the analysis.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Cory Harden	Sierra Club	<p>Include this information in the EIS-- <a href="https://www.staradvertiser.com/2017/05/15/breaking-news/u-s-soldier-killed-in-trainingincident-on-big-island/">https://www.staradvertiser.com/2017/05/15/breaking-news/u-s-soldier-killed-in-trainingincident-on-big-island/</a> U.S. soldier killed in training incident on Big Island By Star-Advertiser Staff and Associated Press May 15, 2017 A 36-year-old U.S. soldier has died during a training incident on Hawaii island. Army Major John Landry says two soldiers were inside a military truck and were hauling equipment to a dock. He says one soldier died and a second soldier was injured and released from the hospital. Both soldiers had been assigned to the 25th Infantry Division on Oahu. Big Island police say the incident happened in North Kona about 7:30 a.m. Sunday as a 20-year-old man was towing heavy machinery on a military tractor-trailer on Daniel K. Inouye Highway. The man lost control while turning left at the three-way intersection with Route 190 and the tractor-trailer struck the southbound guardrail on Route 190 before overturning into a culvert, police say. The front seat passenger was taken to Kona Community Hospital where he died at 12:35 p.m. Sunday. The driver was taken to North Hawaii Community Hospital. An autopsy has been ordered to determine the older man's exact cause of death...</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Cory Harden	Sierra Club	<p>3.15 Utilities 3.15.4 Existing Conditions Potable Water Water is regularly trucked 40 miles via 5,000-gallon tanker trucks... Fire Protection Water The dip tanks are refilled via 5,000-gallon water tankers... p. 3-194 to 3-195 Evaluate impacts for safety, traffic, and road wear. Liquid Fuel The PTA fueling station includes gasoline, diesel, and Jet A fuel.. p. 3-196 Evaluate impacts for safety, traffic, and road wear from transporting fuel. ?</p>	<p>Section 3.12 revised to better highlight existing and potential impacts on traffic, road wear, and safety hazards associated with trucking water and fuel to PTA.</p>
Cory Harden	Sierra Club	<p>3.16.4 Existing Conditions Wildland Fire Management p. 3-205 How will climate change affect fire frequency and intensity, and what steps will the Army take to deal with this? Include information on inadequate staffing and equipment: <a href="https://www.hawaiinewsnow.com/2022/05/12/federal-firefighters-pohakuloa-battlearmy-over-safety-retaliation-complaints/">https://www.hawaiinewsnow.com/2022/05/12/federal-firefighters-pohakuloa-battlearmy-over-safety-retaliation-complaints/</a> "We have minimal trucks available, we're very undermanned..." [union President Kaanapu Jaccobson] says shoddy vehicles and equipment have been ignored for years." Include information on these fires—causes, impacts, prevention measures taken in response: <a href="https://www.bigislandvideonews.com/2021/08/11/10-acre-wildland-fire-reported-inkeamuku-maneuver-area/">https://www.bigislandvideonews.com/2021/08/11/10-acre-wildland-fire-reported-inkeamuku-maneuver-area/</a> ...10-Acre Wildland Fire Reported In Keamuku Maneuver Area... <a href="https://www.bigislandvideonews.com/2021/07/15/pohakuloa-fire-engine-catches-fire-on-highway/">https://www.bigislandvideonews.com/2021/07/15/pohakuloa-fire-engine-catches-fire-on-highway/</a> ...A P?hakuloa Training Area fire engine caught fire on the Daniel K. Inouye Highway on Wednesday morning... July 17, 2021 fire and 2018 wildland fire (also discussed in DEIS pp. 3-32 to 3-33)</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Cory Harden	Sierra Club	<p>4.3 Past, Present, and Reasonably Foreseeable Future Actions 4.3.1 List of Projects p. 4-3 Include a list of all current and former military sites on Hawai'i Island. For each former site, state whether it is cleaned up, or where is it in the cleanup process and when cleanup will be completed. How many private properties cannot be evaluated for cleanup because owners refuse? Is it still legal if a person selling property does NOT reveal that cleanup for unexploded ordnance has occurred on the property? How much time and effort is the Army is putting into lobbying for cleanup money, vs. time spent trying to get money for new projects</p>	<p>The evaluation of all current and former military sites on the island of Hawaii is beyond the scope of the EIS.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Cory Harden	Sierra Club	<p>Chapter 5 OTHER REQUIRED CONSIDERATIONS 5.2 Incomplete Information 5.2.2 Lease Compliance Actions Explain how the State can fulfil its legal obligations to beneficiaries (see comments re. 3.2.2) if it allows the Army to retain the land, knowing that the Army is a bad actor which has violated terms of the lease for years by leaving discarded and hazardous materials on the land at Pohakuloa and other sites. Review State law, past DLNR decisions, contested case decisions, and court decisions re. renewal of State leases for lessees who have not fulfilled obligations in their lease agreements, and/or have been bad actors when using non-lease lands. Describe how well the Army has complied with lease requirements to avoid damage and pollution and to clean up waste. Describe steps that have been taken to clean up the area and comply with the 2019 Supreme Court decision, including any formal inspection, monitoring, and reporting process conducted by Department of Land and Natural Resources. Include future plans and timelines. Include a copy of the lease, lease amendment, and court decision, or a link to access them. What is the impact of past and proposed Army activities on the public trust obligations of the state? The State of Hawai'i has responsibilities as a Trustee of the lands at issue, including fiduciary responsibilities to the beneficiaries, identified in the law as Native Hawaiians and the General Public.</p>	<p>The State's compliance with its fiduciary responsibilities and trust obligations is beyond the scope of the EIS.</p> <p>Sections 3.2.4 and 3.5.4 revised to state that DLNR has implemented the Court Ordered Management Plan and site visits are occurring. Army has received no corrective actions from the site visits. Army only accommodates the requisite site visits as requested by the Court Ordered Management Plan.</p> <p>Section 3.5.4 describes cleanup of hazardous substances and hazardous wastes within the State-owned land.</p> <p>The Army's cleanup efforts after training exercises are discussed in Section 3.5.4.11. Text clarified to note that the Army removes or deactivates all live and blank ammunition upon completion of a training exercise in compliance with the lease and removes solid waste prior to departing a training area or range facility in accordance with the U.S. Army Garrison PTA External Operating Procedures.</p> <p>In accordance with the lease and under the provisions of existing law, the Army retains responsibility for cleanup and restoration of former training areas. After the lease expires, if deemed necessary, the Army would follow Army regulations to determine how and when the cleanup and restoration of State-owned land not retained would occur, following the CERCLA process.</p> <p>The Court Ordered Management Plan and current lease were added to EIS as appendices for easy reference by EIS readers.</p>
Cory Harden	Sierra Club	<p>Do the environmental impacts of the State of Hawai'i continuing to lease the trust lands to the Army benefit the beneficiaries, or is the documented degradation of the leased lands a violation of the fiduciary responsibilities? (See Ching v Case SCAP-18-0000432) What is the fair market value of the land the Army is currently using? Has the State of Hawaii carried out its trust obligations to the beneficiaries when the lease fee is \$1 for the entire 65 years? If the land is rendered useless and dangerous as a result of Army activity, does that reduce the fair market value, and is the State of Hawai'i complicit in this degradation of the benefits of the trust? The P?hakuloa lease calls for cleanup: Conditions from State General Lease S-3849 dated August 17, 1964 between State of Hawai'i (Lessor) and U.S.A. #9: ... the Government shall make every reasonable effort...to remove or deactivate all live or blank ammunition upon completion of a training exercise or prior to entry by the said public, whichever is sooner. #14: ...the Government [USA] hereby agrees that, commensurate with training activities, it will take reasonable action to...remove or bury all trash, garbage and other waste materials resulting from Government use of the said premises.</p>	<p>The State's fiduciary responsibilities and trust obligations are beyond the scope of the EIS.</p> <p>Sections 3.2.4 and 3.5.4 revised to state that DLNR has implemented the Court Ordered Management Plan and site visits are occurring. Army has received no corrective actions from the site visits.</p> <p>Sections 3.2.4.1 and 3.5.4.11 revised to note that the lease requires the Army to make every reasonable effort to remove or deactivate all live and blank ammunition upon completion of a training exercise or prior to entry by the public, whichever is sooner.</p>

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Commenter	Submitted By	Comment	Response
Cory Harden	Sierra Club	<p>But the Army did not clean up: Findings of Fact from SCAP-18-0000432, Ching v. Case, pp. 30 - 34 <a href="https://www.courts.state.hi.us/wp-content/uploads/2019/08/SCAP-18-0000432.pdf">https://www.courts.state.hi.us/wp-content/uploads/2019/08/SCAP-18-0000432.pdf</a> Cultural monitors spent “extensive time” at the leased PTA land and observed military debris on the ground, including UXO and “spent shell casings, scattered across” the land. The concerns of the cultural monitors were documented in a number of federal reports. For example, the United States prepared a November 2010 report entitled “Final Archaeological and Cultural Monitoring of Construction of Battle Area Complex (BAX) for Stryker Brigade Combat Team (SBCT), Pohakuloa Training Area, Hawaii#i Island, Hawaii#i” that included a recommendation from cultural monitors that “[ t]he Military needs to implement some kind of cleanup process as part of their training in PTA. Remnants of military trash are everywhere.” (Emphasis omitted.)</p>	<p>Section 3.5.4 describes cleanup of hazardous substances and hazardous wastes within the State-owned land.</p> <p>The Army's cleanup efforts after training exercises are discussed in Section 3.5.4.11. Text clarified to state Army removes or deactivates all live and blank ammunition upon completion of a training exercise in compliance with the lease and removes solid waste prior to departing a training area or range facility in accordance with the U.S. Army Garrison, Pohakuloa (USAG-PTA) External Standard Operating Procedures (2018).</p> <p>Sections 3.2.4 and 3.5.4 revised to state that DLNR has implemented the Court Ordered Management Plan and site visits are occurring. Army has received no corrective actions from the site visits. Army only accommodates the requisite site visits as requested by the Court Ordered Management Plan.</p> <p>In accordance with the lease and under the provisions of existing law, the Army retains responsibility for cleanup and restoration of former training areas. After the lease expires, if deemed necessary, the Army would follow Army regulations to determine how and when the cleanup and restoration of State-owned land not retained would occur, following the CERCLA process.</p>
Cory Harden	Sierra Club	<p>The report also stated that the cultural monitors voiced the following: “Another major concern is the military debris that is left behind after training including [UXO] that is carelessly discarded. There is a need to have some type of cleanup plan implemented in the military training process.” ... These concerns were reiterated four years later in a second, similarly titled report. This report contained observations from cultural monitors who stated that “[r]emnants of live fire training are present within the BAX, including stationary targets, junk cars, an old tank, crudely built rock shelters, and miscellaneous military rubbish. Spent ammunition is scattered across the landscape.” The report noted the cultural monitors feared that if the litter continued to remain on the land, “ the land will be rendered unusable forever--one eighth of our island will become unavailable for use by any of our future generations .” The cultural monitors therefore “strongly recommend[ed] the Army begin now to seek funding to initiate a serious cleanup effort throughout the leased training areas.” (Emphasis in report.)</p>	<p>In accordance with the lease, and under the provisions of existing law, the Army retains responsibility for cleanup and restoration of former training areas. After the lease expires, the Army will follow Army regulations to determine how and when the cleanup and restoration will occur, following the CERCLA process.</p>
Cory Harden	Sierra Club	<p>The military has also been a bad actor at other sites. Findings of Fact from SCAP-18-0000432, Ching v. Case, pp. 31 - 32 <a href="https://www.courts.state.hi.us/wp-content/uploads/2019/08/SCAP-18-0000432.pdf">https://www.courts.state.hi.us/wp-content/uploads/2019/08/SCAP-18-0000432.pdf</a> ...the court found that the previous Chair of the DLNR, William Aila, Jr., was aware of the United States’ failure to clean up other sites in the state such as Kaho’olawe, Mākua, and the Waikāne Valley, and the court imputed this knowledge to the State in this case. The court noted that a website maintained by the State contained a history of the island of Kaho’olawe that explained that the United States Navy did not clear all UXO from 25 percent of the surface of the island. Additionally the court found that the United States’ failure to properly clean the Mākua area was... documented in the federal court decisions in Makua v. Rumsfeld, 163 F. Supp. 2d 1202 (D. Haw. 2001), Mākua v. Gates, Civ. No. 08-00327 SOM/LEK, 2009 WL 196206 (D. Haw. Jan. 23, 2009), and Mākua v. Gates, Civ. No. 00-00813 SOM, 2008 WL 696093 (D. Haw. Mar. 11, 2008).</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Cory Harden	Sierra Club	<p>Aloha, Please acknowledge receipt. Adding to our eariier comments, please consider information from the attached article. mahalo, Cory Harden, Sierra Club, Hawai'i Island Group Firefighters complain about unsafe conditions at PTA By MICHAEL BRESTOVANSKY Hawaii Tribune-Herald   Sunday, May 22, 2022, 12:05 a.m. The U.S. Army is addressing complaints by federal firefighters about unsafe conditions at Pohakuloa Training Area, according to an Army official. In March, firefighters at PTA made a complaint to the U.S. Department of Labor Occupational Safety and Health Administration listing several unresolved safety violations. Those violations included a missing fire suppression system in the living quarters of the PTA fire station, reportedly requiring firefighters to live in decades-old prefabricated steel Quonset huts without a formal kitchen area, and forcing them to wash dishes in a makeshift area by their toilet and shower. Other violations reported included a lack of proper fit-testing for breathing apparatuses and masks, a nonfunctioning ventilation system that failed to remove gases from fire trucks, and other safety rules not being followed.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Kimi Abbott-Jackson		<p>Please do not renew the militaries lease on Pohakuloa. I do not agree that the military should continue to bomb on an active volcano. Year after year they continue to desecrate the island of Hawaii. This island has been used as a training area for too long. Even in Waikoloa Village we have been unable to build because of the unexploded ordinances. It is time to stop. Aloha Kimi Abbott</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Chelsy Abe		<p>The last Biological assessment was done in 2003. I think there should be a new study since it's been almost 20 years. How many miles away does the training affect? We have many endangered animals and insects in the area including the pueo which frequents Waiki'i area and nests on the ground, the nene which flies by and lands by the cattle guard on Mauna Kea access road, or the 'ua'u who nests in the mountain, also the Vanessa tameamea aka Kamehameha Butterfly and the Udara Blackburni aka Koa Butterfly which dwell in the area etc. When I am on the Mauna Kea access road or close to Kamuela, I can hear and feel the vibrations of all the training going on at Pokahuloa. If i can hear and feel it, imagine how all the animals and insects feel. I propagate a lot of native plants such as ohia, mamaki, koa and other native plants to help the native animals and insects thrive. All that land pohakuloa is taking up could be developed to reforest and preserve what little we have left.</p>	<p>The Army is preparing a draft programmatic biological assessment that is comprehensive in scope. It will describe current status of the species (based on the best available information), impacts and conservation measures.</p>
Chelsy Abe		<p>I spoke with a woman named Alice at Imiloa. I gave her my email and phone number so she could answer some of my questions. I haven't heard from her since then. My question is how far was the Environmental Impact Assessment done? Was it only in the area of the training area or how many miles away does the training affect? We have many endangered animals in the area including the pueo which frequents Waki'i area and nests on the ground, the nene which flies by and lands by the cattle guard on Mauna Kea access road, or the 'ua'u who nests in the mountain etc. When I am on the Mauna Kea access road or close to Kamuela, I can hear and feel the vibrations of all the training going on at Pokahuloa. If i can hear and feel it, imagine how all the animals and insects feel. I propagate a lot of native plants such as ohia, mamaki, koa and other natives to help the native animals and insects thrive. All that land pohakuloa is taking up could be developed to reforest and preserve what little we have left. Alice said the people training were in charge of how far it affects but is unknown when the last assessment was done. Could someone please contact me?</p>	<p>Noise impacts on species are discussed in Sections 3.3.4.4 and 3.7. Resource areas vary in geographic analysis based on the needs of the section as noted in each individual Region of Influence section. For noise, the region of influence extends "into surrounding areas on and around PTA that might be affected by aircraft conducting training on PTA or military munitions noise."</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Justin Abe		<p>I oppose the full continued lease of the Hawaiian Lands to the United States Military. As a born and raised Hawaiian and pursuing a degree in Environmental Science with knowledge of the NEPA process, I believe that water resources and hazardous materials are of concern with extending the lease for the full 23,00 acres.</p> <p>In the original lease, Paragraph 9 states that the military must "make reasonable effort to...remove or deactivate all live or blank ammunition upon completion of a training or prior to entry by the said public". This agreement goes with paragraph 19 that states they will "remove weapons and shells used in connection with its training activities to the extent that a technical and economic capability exists and provided that the expenditures for removal of shells will not exceed the fair market value of the land". I do feel that it is strongly beneficial that the military covers the Resource Conservation and Recovery Act of 1976 for management of the control of hazardous wastes and addition to removing the shells and ammunition once training is completed.</p>	<p>In accordance with the lease and under the provisions of existing law, the Army retains responsibility for cleanup and restoration of former training areas. After the lease expires, if deemed necessary, the Army would follow Army regulations to determine how and when the cleanup and restoration of State-owned land not retained would occur, following the CERCLA process.</p> <p>As noted in Section 3.5.4.11, soldiers are required to collect casings from spent rounds, wood boxes, and other solid waste debris generated during live-fire training and return them to the ammunition holding area and ammunition supply point for recycling or disposal, as appropriate.</p> <p>Sections 3.5 and 3.15 supplemented with relevant information from Pohakuloa Training Area Range Operations Standard Operating Procedures (2022) regarding cleaning ranges after training.</p>
Justin Abe		<p>In addition, paragraph 14 states the military agrees to "take reasonable action...to prevent unnecessary damage or destruction of vegetation, wildlife and forest cover, geological features and related natural resources" and to "avoid pollution or contamination of all ground and surface waters and remove OR bury all trash, garbage and other waste materials". I do not see how an option for burying trash an option for land within Hawaii is.</p> <p>With the training being completed 1,800 feet above an aquifer, the future possibility of pollution entering he water resources are increased with the lack of responsibility placed on the military. From the original time that the lease had been started, 65 years ago, there have been new technology with stronger weapons that has the capability to damage the land further and also create a higher chance of pollution into the soil and water resources. One example was the bazooka range that had been heavily contaminated with ammunition and unexploded ordinance that was reviewed in 2014-2015. If the military had been up to their lease agreement, there would not have been hazardous materials of dangerous levels reported.</p>	<p>Specific water resources protection actions have been added as Section 3.9.4.6, "Existing Management Measures." These procedures minimize impacts on water resources from ongoing activities.</p>
Justin Abe		<p>The United States Military has had the many years of access to this land and failed to address the conditions on their lease agreement and within the EIS such as clearing hazardous materials after training procedures. The in-depth review of archaeological literature and cultural impact has many sources and statements that shows how important that the land is to the people of Hawaii and with the failure of clearing ammunition, should not allow them to extend their lease without engaging in surveying and removing hazardous materials.</p> <p>The review of this is also lacking for archaeological aspect as only 45% of the land has been analyzed for archaeological importance.</p> <p>There is over 11,500 acres that have not been surveyed for importance and possibly damaged from the 65 years of training completed by the U.S. Military. This reasoning should not allow the military for extension of the lease. If the decision is made for any of the alternatives besides the no action alternative, the lease should be modified to be applied to the new technology for clearing the land as well as hazardous materials within the ammunition.</p>	<p>EIS Section 3.4.4.3 has been revised to describe why certain areas have not been surveyed. Figures have been refined to show where surveys have been completed, and the general locations and types of sites within state-owned lands.</p>
Kalei Acia		Please save pohakuloa!!! Our 'aina is deteriorating!!!	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Jim Albertini		This is Jim Albertini from Kurtistown, Hawaii. I have been trying to watch this livestream on your -- on video online. The sound system at Waimea is just terrible, it's very, very difficult to understand people, and your print translation is awful. It doesn't make any sense whatsoever. So it's a very, very poor opportunity to have these -- to see what's going on. Besides, the Big Island is a big island. You should be having meetings in every district on the island. The Puna District in itself where I'm from is bigger than the island of O'ahu. So with the price of gas and everything to only have two meetings on the island, and with terrible sound systems, it's a disgrace. Please improve yourself. All right? Thank you.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Nancy Aleck		Re: Pohakuloa Americans with power believe in the trickle-down theory. That's because they can keep their power and wealth and steer clear of the toxins that trickle down to the rest of us. I do NOT support lease renewal. I DO support an immediate end to military use. Stop the bombing. Clean it up and return the land. Most Sincerely, Nancy Aleck	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Karen Altergott		Hi, this is Karen Altergott, a resident of Waikoloa. I'm calling to encourage you to do an Environmental Impact Study. I know living here with the bombing sound is most unpleasant, and I am concerned about chemicals in the air that head down this way. Thank you very much for your time.	Thank you for sharing your concern. Discussion on the Army's compliance with the Clean Air Act is found in Section 3.6 (Air Quality and Greenhouse Gases) of the Environmental Impact Statement.
Theresa Arriola		I am writing to request that a comprehensive independent assessment of the chemicals at PTA be conducted in order to ensure that proper clean-up of these lands occurs. I believe the 133,000 acres of land should be returned to the Native Hawaiian people.	Hazardous substances and hazardous wastes are discussed in Section 3.5 of the EIS.  In accordance with the lease and under the provisions of existing law, the Army retains responsibility for cleanup and restoration of former training areas. After the lease expires, if deemed necessary, the Army would follow Army regulations to determine how and when the cleanup and restoration of State-owned land not retained would occur, following the CERCLA process.
Cameron Atsumi		Driving by Pohakuloa on Saddle, one can notice more and more visible developments on the slopes of Mauna Loa. From satellite imagery, one can view at the southwestern end of the old Kona-Hilo hwy these visible developments. Closer look showing jets parked in a white dashed quadrant above 7,000'. Please understand that the visibility of these developments and operations are an increasing concern to the growing surrounding populations. Greater traffic along Waikoloa Road during convoy transfers must also be addressed. Thank you.	Section 3.12.4 has been revised with the most updated available information.

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Lyle Auld		<p>With the renewal of the lease, the military would better accommodate training requirements and testing new weaponry. The lease lands would bring more responsibilities of compliance, stewardship and management of the cultural properties and environmental resources. A new lease may require an updated Integrated Cultural Resource Management Plan (ICRMP) that combine efforts of management and conservation with the daily activities and training SOP. The ICRMP is the base commander's main tool for cultural resource management and should be tailored for each installation needs. Communication between all players, military, contractors, SHPO, Burial council, Tribes, NHO, stakeholders, and community, will be essential for a successful management plan. Dr. Alex Woods of Colorado State University writes, " Each Army installation and it's ICRMP are unique and special snowflakes, largely resulting from the culture and personality of installation staff and their ability to wheel and deal" (Woods, CSU online discussion 2022). The ICRMP should define the traditional cultural (TCP) and historical properties. The goals of the community, tribes and the identified stakeholders should be shared with the SHPO and the federal agency to come to a balance or happy medium. Not everyone will walk away happy, but all should try to be open to negotiation (CSU online Lesson 15, page 3). I would even suggest adding the comments of the community/Native tribes/NHO in the ICRMP to show transparency, positive efforts and it will set milestones of progress. Many of the installation ICRMPs are made open to the public. There should be a conversation of the tangible and intangible, moveable and immovable, old and new model, and all the different ways of classifying the resources, relevant eras or time periods, architecture, landscapes, sites, and districts. If everyone is on the same understanding than it would eliminate confusion and I would expect fewer negative blowbacks to the everyday maintenance and upkeep of an installation and its cultural properties.</p>	<p>Your comment on the updated ICRMP is noted but is beyond the scope of this EIS. The Army addresses cultural resources in Section 3.4 of this EIS.</p>
Lyle Auld		<p>Around the globe, federal installations have similar struggles and issues with management of cultural properties (CSU online discussions). I would suggest exploring possible SOP changes. First, I would combine the environmental and cultural ways of thought. I know it's a funding issue of value and significance, but one cannot mention our culture/cultural properties and then not talk about the environment, plants, or landscape. In many cultures, the environment (flora and fauna) is intertwined. The Hawaiian culture and the rest of the pacific islanders, are plant based cultures and every aspect of their survival is based off the plants (<a href="https://dlnr.hawaii.gov/dofaw/files/2014/02/Hawaiian-Ecosystems-and-Culture-Growing-Lei-plants-1.pdf">https://dlnr.hawaii.gov/dofaw/files/2014/02/Hawaiian-Ecosystems-and-Culture-Growing-Lei-plants-1.pdf</a> page 7). Total integration with other departments, allows the team to be more diverse and able to recognize so much more of the history and functions in the culture. I am not suggesting the sharing of roles or duties, I mean collaboration of data and understanding. Water has been its own category, but I believe it should be part of one unit with cultural and natural resources all with the same shared management goals. If money and time was not an issue, I suggest contractors to invest in team force development and providing enough employees to handle compliance and responsibilities required by law. I would recommend workshop or trainings to strengthen the employees and entire workforce to be extra-disciplinary (King 2004). Cultural awareness and shared collaborations with the tribes, to help educate, can go a long way. There are several federal and state laws that have been created to protect the cultural properties. GENERAL LEGISLATIVE AUTHORITY MANDATING ARCHAEOLOGICAL CURATION 1906 Antiquities act (P.L. 59-209) 1935 Historic Sites Act (P.L. 74-292) 1966 National Historic Preservation Act, as amended (P.L. 89-665, 95-515, and 102-575) 1979 Archaeological Resources Protection Act (P.L. 96-95) 1984 Department of Defense Directive Number 4710.1 1990 36 CFR Part 79 (Curation of Federally Owned and Administered Archaeological Collections)</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Lyle Auld		<p>The proper facilities to house the collection and artifacts should be available or constructed for the cultural resources. Many installations would require a proper space that could keep human remains until the native tribes and or lineal ties and burial council were involved, (if in-situ was not an option). Someplace that was secure, quiet and safe for this type of NAGPRA compliance duties ( <a href="https://www.nps.gov/subjects/nagpra/on-federal-or-tribal-lands.htm">https://www.nps.gov/subjects/nagpra/on-federal-or-tribal-lands.htm</a> ). Another easier said than done suggestion, is to plan projects early enough to handle the delay for the Section 106 process and the feedback from SHPO. Time and time again, DPW and other contractors forget about the 106 process and complain of the schedule delays. The section 106 process of communicating to the stakeholders, community and Native Tribes/NHO is often viewed as step to avoid at all costs by the federal agency, but compliance is in place to aid with liability and blame (King 2003 page 30). More land would equal the need for more money. If the landholdings double then personnel, contracts, funding, and time to accomplish the task, will all be altered.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Lyle Auld		<p>Several thoughts come to mind with this lease issue. Where does the money go and how does it help the Hawaiian people as a whole? Would the military be able to pause training during the opening of Makahiki, Winter/ Summer solstice and other relevant days to do protocol, ceremony, or cultural practices on the installation? Could the hunting access be more frequent or open, so hunters could use the designated hunting zones more than several times a year? In conclusion, it is my findings that with the proper planning and communication, of the community, stakeholders, lineal descendants, and agencies, I believe land and cultural management on military lands can be done . I prefer the "new model" way of thought, to stimulate the next generation and to prepare them to assume the role of stewards and managers. It would be great to change the mindset of heritage resource management around the globe, but value is an individual choice to be learned and shared. Work cited <a href="https://www.bos.com/inspired/40-quotes-on-adapting-to-change/">https://www.bos.com/inspired/40-quotes-on-adapting-to-change/</a>, (Web) <a href="https://www.geeksforgeeks.org/impact-of-technology-on-society/">https://www.geeksforgeeks.org/impact-of-technology-on-society/</a>, (Web) <a href="https://www.nps.gov/subjects/nagpra/on-federal-or-tribal-lands.htm">https://www.nps.gov/subjects/nagpra/on-federal-or-tribal-lands.htm</a>, (Web) Byrne, Dennis, Heritage As Social Action, 2008 Woods, Alex, CSU online discussion 2022 King, Thomas, Places That Count: Traditional Cultural Properties In Cultural Resource Management, 2003 King, Thomas, 2004, Learn More Than One Specialty , Lesson 15 CSU online.</p>	<p>Section 3.4.4.4 of the EIS and Sections 5.0 and 6.0 of the CIA have been revised to reflect additional information provided by interviewees who responded to a second request for input in December, 2022, following the height of the COVID-19 pandemic.</p>
Kalia Avery		<p>Aloha to All involved in this EIS study. I recently spend a day of solitude on Pu'u Huluhulu. This very sacred part of the Island where one can view all The Maunas at one time. During my time in self reflection I was very disturbed by the incessant bombing at Pohakuloa. This is so very disrespectful to use this beautiful Aina, the place that feeds us, to play war games and pollute the environment like this. I do believe it is past time to pull back the leases that were given long ago, and reconsider how we treat these Islands. It's time to remember that life as we know it will be gone if we don't stop mistreating this earth. Please think about the future generations and preserve our climate, water air and tranquility. War is not the answer! Stop pretending to be culturally aligned with the values of Hawaii. Mahalo for including this testimony.Be Pono and don't continue this lease! With all Love and Respect Kalia Avery</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Ronald Awaya		<p>Being a veteran (US Army, Czech border patrol 1968-1970 4th Armored Division) I believe that the Army does need training to be "combat ready". However, does the training at Pohakuloa meet the necessary requirements to be combat ready should a war break out? Perhaps some extra training like AIT would benefit the soldiers more to be combat ready. Seeing that the soldiers aren't privates, instructional classes by instructors who specialize in warfare tactics would be beneficial say at an AIT center elsewhere within CONUS.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Hector Ayala		<p>My name is Hector Ayala. I come from the desert south of Sonora and Mojave, so I'm Chicano. I'm Mexican. I have lived in Hawai'i for about a year. I have worked on the aina for about a year, a little over a year. I guess some points that I'd like to say is stop the bombing. Don't tap into the water. I love these people. I'm not Hawaiian, but I love Hawaiian culture because it relates to my culture so much. The things that I have seen here and the things that I have understood about myself here I cannot change. The wounds that I have put on here I cannot change. I come from a point of view of an enlisted soldier at some point in my life. 2015 I joined to leave Riverside, California for a better life. I served my years and I left drunk. Long story short, not the point. The impact that the United States Army and the United States has had on native culture and native people, in general, has been absolutely atrocious, in my personal opinion. There is no other words for that. Well, there is a lot, but no point saying them now, because anyway. My point is, speaking to Colonel, Lieutenant Colonel, standing at a position of parade rest to let you know I'm not here to hurt you. I love you. I love everyone here. And I want you to know that our presence here and when we talk about matters. You both are very smart, very intelligent, both officers. You went to college. You must hear what we are saying. You must feel what we are saying. You are not robots, you are humans. The Army makes you robots. You are truly human, luminous being of love. Anyway, you both probably have families and know that love, as well. That same love, we have that love for our aina, for what we live on. This is family. We don't shoot our family. I don't have much to say any more, but Aloha. Thank you. I don't know how long I am going to stay in Hawai'i. I know I won't stay here. I know I will go back to the desert of Sonora, but the time I stay here I will continue to malama aina and I will continue to support the Mainland and hopefully teach aloha. Thank you.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Bronson Azama		<p>This process is fraudulent! The Army and its nation-state the United States needs to address the legalities that are perceived to allow the ability to conduct this study. I am a Hawaiian National, and until the Army can prove its jurisdiction and the United States reveal how these lands were legally obtained then the EIS cannot be accepted. We cannot operate from the illegality of annexation to the United States because if it is not your land then we cannot follow your laws. Until you can prove that the Newlands Joint Resolution could legally obtain the Hawaiian Kingdom's Government lands and the private estate of our mo'oi, which we refer to as the "Crown Lands", then we SHOULD NOT LEGALLY BE ABLE TO MOVE FORWARD WITH AN EIS, because we are not following the proper laws of the land.</p> <p>Since the illegal military occupation of our islands started on January 17, 1893, we have now seen our lands, waters, and air polluted to a level unprecedented compared to times prior to the illegal usurping of our Queen and Government. Just recently the Navy's fuel stored at the Red Hill Bulk Fuel Storage Facilities; which is utilized by other branches of the military; has contaminated my island's aquifer. Such fuel has fueled the exercises that further pollute our islands, and our ocean, and even support the bombing of Pihalea. We cannot lose sight of ensuring the continuity of our ability to live on these islands.</p> <p>The United States as an illegal occupier should not be able to move forward with their operations until the legal questions surrounding land ownership and jurisdiction in Hawai'i are addressed. I do not support this EIS, nor this fraudulent process until the legal issues are addressed.</p>	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Camille B		This is extremely disrespectful to Hawaiians. This is a sacred spot. More sacred than Notre Dame or Great Wall of China. Respect the land and return it	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Christoph Baranec		I live and work on Hawaii island. I fully support our military's continued use of the ~23K acres of state owned land.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Leilani Barga		I do not agree with the proposal of the retention and extension of the Army training land at Pohakuloa training area. The land should be returned back to the State of Hawai'i for use by local Hawaiian peoples.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Natalie Baribeault		Please get out of this land. The environmental and cultural impact is too great. Do not renew this lease and do not continue activities there.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Kallie Barnes		The No Action Alternative is the only option for the U.S. Military on these lease lands. The 24/7 bombing is enough and honestly the EIS seems to be significantly undermining the damage done by the military at PTA. As a worker in conservation I am often in remote areas on both the east and west slopes of Mauna Loa. The bombing is constant, stressful and unsettling. I can only imagine what it feels like to live where you can here it consistently. It's a crime that the military was able to lease the land for \$1 and it would be a crime to allow them to continue to lease this land. This land should be designated for both Hawaiian Homestead and conservation land. The U.S. Military should be required to clear and clean up the land and take it's training elsewhere.	Thank you for your sharing your concerns. The Army understands its responsibilities for proper stewardship of the land and has the utmost respect for Native Hawaiians. Please see Sections 3.3 and 3.4 (Biological and Cultural Resources) of the EIS for more information. In accordance with the lease, and under the provisions of existing law, the Army retains responsibility for cleanup and restoration of former training areas. After the lease expires, the Army will follow Army regulations to determine how and when the cleanup and restoration will occur, following the CERCLA process.
Darcy Bartoletti		Please end the unsanctioned use of Hawaiians land. The spiritual and environmental impact is devastating.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Beau Bassett		The area should be added to Mauna Loa forest reserve as well as Puu Waa Reserve and Mauna Kea FR. A removal of UXO should be done and converted to a hunting unit for sustainable harvesting and preservation. Access should be open to the public just as Mauna Kea Forest Reserve. The US military does not need training and makes no logistical sense for this area when places on the contiguous US have many better places for training, as well as Oahu which the military currently owns 50% of combined. Please give back the lands to the public and remove all ammunition and military waste that has littered the area for over 50 years, similar to what has been done in Kahoolawe, Waikane, and Makua. Mahalo.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
JOHN BEGG		The Department of Defense should pay the State of Hawaii and the County of Hawaii a substantial lease payment for occupying so much area. Inflation adjusted terms need to be part of any new agreement as well as restoration should the lease be terminated.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Thomas Belfield		I lived and worked on the Big Island from 1986 to 2010. Pōhakuloa Training Area should be shut down and cleaned up. It is an absolute travesty what the Army has done there and there are some places that likely never will be safe or clean again in 100 years. Shameful. Clean it up and go home.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Sam Bergstrom		This training area is a waste of beautiful land that could be used for such more environmentally important things like native species regrowth, nature trails, planting trees. The military presence on the island is unhelpful and worrisome. Please put it to better use.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Emily Black		I believe that pōhakuloa should longer be used as a practice site for the military. continued bombardment to the land is not good for the environment or the people.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Alyssa Bolante		It is time to give the land back to the people of Hawaii. Keeping this as a military training area has significant adverse impacts on the land, cultural practices and resources for the people of Hawaii. When deciding to move forward with this draft who does it center the people in power or does it center the people of Hawaii who are most vulnerable and have been marginalized. Are we listening and trying to understand the people of Hawaii who want the land returned?	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Duke Bourgoin		Proposal that the US Army assist with selecting some land to develop small half-acre farm lots for Hawaiians with local Hawaiian control of housing standards/rules and assistance from Army Engineers for building infrastructure with organic sustainable land management.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Eduardp Bradley		There is absolutely no good reason to continue this lease. I choose EIS option 4 the no action alternative. It's the right thing to do, Protect this Island from toxic impacts. Sincerely Eduardo Duran Bradley	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Skyler Brown		Aloha. Being born and raised in Hawaii , I have developed the inherent care for the aina that is common among our people here. Learning as I have, of the way it used to be , it has become apparent that the saddle of the island .. the area between all four mauna , was once densely forested and held a cloud bank which fed the water tables tenfold of what they receive today. Today, our water tables are threatened, and with future development we can't help but compensate for, it is crucial to reestablish forest in this vital area. This reforestation effort would do so much for the island that the west side would become much greener, and the forest east side would have less of a settling effect on the clouds; thus balance would be restored upon the aina. There is no way for the community or the governance of big island to make these sorts of changes while military occupation continues. Aloha and mahalo.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Robert Gregory		<p>Dear Senators Aloha to you and although you are from NY and this article that follows is about Hawai'i, I believe the concerns are important to all americans - the US military has trashed the once pristine island of Hawai'i - Big Island.</p> <p>The island has not only been trashed, it is dangerous to all who live there, visit, or come in contact - given the humongous quantity and the quality of the poisons, toxins, heavy metals, depleted uranium, and unknown materials that certainly influence health of the environment and of creatures near and far as the winds, water, time spread these chemicals - such a sad situation for the world.</p> <p>I call on you to affirm that the US military, which has caused this problem, now must be forced to clean up the mess - and/or get appropriate agencies at federal and state levels, to clean this up for the military has shown little interest an no ability in cleaning, preventing problems, or even minimizing the harm from this situation. Please read the comments by Jim Albertini and please do something positive while you are in Washington - clean up the mess, remove the military presence from Hawai'i, prevent the military from renewing a ridiculous lease that was forced on the people and negates anything resembling "fair", and return the island to some state of sanity whereby health and safety of people and unique plants and unique creatures and land and the ocean will be protected. The military is incapable of doing this on its own, so it is up to politicians with the interest of all people, with the interests of future generations, with the interests of the environment, to act. While you are at it, you might consider the impact of the US military on other locales, throughout the entire world, where US bases operate. They too, are not improving the environment, or even preserving the environment - trashing and destroying is what the military is about and that is very very sad. Mahalo - bob g</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Shantee Brown		<p>My name is Shantee Brown. I was raised in Waikoloa, which is right below Pohakuloa. One thing that really stood out from this EIS is how narrow it is. What I first see is the statement of like how important it is for all of the missions in the Pacific and really world-wide for training. And then the impact statement is this very narrow 23,000 acres. When really we need to look at what is the world-wide impact, the island wide impact of this training. The use of munitions that are going to be used to kill innocent civilians, which, you know, in 2022 we already know that civilians are -- they are overly killed in war. That is a burden that we carry on this island that we're training to kill people around the world, but something that should be looked at is the psychological impact not only to civilians here, who know that but also our troops who are going to face probably PTSD and now high rates of suicide. You know, we talk about in the EIS the mammals that are impacted. I'm like can we maybe include the human mammals and impact to us? You know, I grew up with bombs shaking my house. I would say like the first big awareness of the world was watching 911, and then following that the propaganda for the wars in Afghanistan and in Iraq. If I was a little older I probably would have signed up like you guys and thought that was the very thing to do. And I'm glad I wasn't that old, because as I grew up I met a lot of Brits and what they told me of how it negatively affected them and how the war affected civilians in those countries really changed my world view, that we're not really protecting. Thank you for giving me this time. Okay. Yeah, and that we should look towards our Veterans who are for peace to start practicing diplomacy, because it's time. It's 2022. We don't need to practice bombing anymore. = We're really good at that. Maybe we should start paying our fair share for resources instead of starting wars for resources. There is no reason for us to not have integrity and pay people for their resources in other countries. We don't need to take them. We don't need to force them to pay it or to give us low rates for oil or anything. No. We are all adults here. We can afford, we have a 750 something billion dollar budget a year. We can reallocate that to better ways to work with other countries. Yeah. Thank you.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Shantee Brown		<p>Can you hear me? I heard a lot of people say, why are there not more people here? And one comment I have. So it was stated in the EIS that you all posted in newspapers three times, three different days. I don't know anyone -- I'm 32. I don't know anyone my age who reads a newspaper, like a paper newspapers or probably even like has a subscription. You have to pay for it. So that's a socio economic affect of not being able to see when we have these events. Also, that there were a hundred post cards emailed. I mean, you guys have a huge, huge budget. You could send a post card to every single person on this island, because we are all downwind and downstream from this base. So please for the next EIS do appropriate outreach to get us here, because I guess -- it's not working. The communication to get us out here is not working, because I know a lot of people who would like to be here.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Meredith Buck		<p>My name is Meredith Buck and I live in Kailua Kona, HI. I am a descendant of many generations of Army and Navy veterans (on both sides of my family) as well as a 5th generation descendant of Portuguese and Japanese subjects to the Hawaiian Kingdom. Thank you for the opportunity to share my mana'o regarding land use at Pōhakuloa.</p> <p>Many astute observations have been shared around cultural and environmental impacts. I would like to echo those centering Kānaka ʻŌiwi genealogical relationship to the land; endangered and endemic species; concerns around toxicity and pollution to air and water; and reminders that the US government and military are exerting an unlawful occupation of sovereign Hawaiian lands to conduct operations.</p> <p>I do agree that national and international security are of utmost importance, but I wonder at what cost we will obtain them. Native Hawaiians and wild endemic species will bear the greatest and most immediate brunt of the impacts caused by military operation at Pōhakuloa, and those effects will reach all of us in time if not right away. If the military's purpose is "to serve and protect," I ask that that service and protection be extended every day to those most vulnerable right here at home.</p>	<p>Thank you for sharing your concerns. The Army understands its responsibilities for proper stewardship of the land and has the utmost respect for the Hawaiian native population. Please see the revised Sections 3.3 and 3.4 of the EIS and Appendix I for the CIA.</p>
Meredith Buck		<p>I know that our great military has the capacity to maintain a strong defense while also caring for the daily lives of Native people, plants, and birds. To that end I'd like to share a message written by the team at Birds Hawai'i Past Present: "If the military really needed Pōhakuloa they would have taken care of it over the last nearly 70 years.</p> <p>However since they have held control over the area 6 species of native birds have disappeared. ʻAlalā, ʻUaʻu, Palila, ʻElepaio, ʻIiwi, and Nēnē. Some of these species were found at PTA up until the early 2010s.</p> <p>"A 7th species the ʻakeʻake has only ever been found breeding in PTA. Despite this the base has not taken needed action to protect them, and individuals have been killed by predators. Only three native birds can still be found on the base down from at least 9 and maybe as many as 12. "PTA is also a major source of sheep and goats that damage surrounding forest reserves, and base activity likely attracts and sustains large numbers of predators such as free roaming cats and mongoose that damage palila and game bird populations in public lands." Finally we know from Oʻahu that the US Military is capable of protecting native birds and their habitats. Some of the largest populations of forest birds, and waterbirds occur on military controlled lands because of the predator control and restoration work they support."</p> <p>My relatives who have served, and who are currently serving, know well that it is not only by thoughts and intentions that defense is granted to all, but by well-thought action and sacrifice. For that reason I ask that the military take full responsibility for caring for Pōhakuloa, especially by calling in support from conservation experts and cultural practitioners on Hawai'i Island.</p> <p>Mahalo nui loa for your time and consideration. Envisioning a thriving ʻāina, native birdsong calling across Mauna Kea, and a healthy, happy lāhui across the pae ʻāina. E ola.</p>	<p>Thank you for sharing your concerns. The Army understands its responsibilities for proper stewardship of the land and has the utmost respect for the Hawaiian native population. Please see the revised Sections 3.3 and 3.4 of the EIS and Appendix I for the CIA.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Kelsey Bunting		<p>My name is Kelsey Bunting. I'm not here representing a business or an industry or a corporation, and I'm not just speaking as a Hawaiian or a native person, because I have all blood mixed in me. I just want to be speaking as a young woman. And what I have been learning as a young woman is my potential to give life to this planet and how deeply tied I am to this earth and this land, because how deeply tied I am to creating life on this planet. I'm speaking as a young woman who is concerned about the state of war, the state of war in Hawai'i, the injustice, the illegal occupation, because the state of war is a state of mind. The state of war is a state of mind. The state of war is a state of mind. It's a feeling of fear and anxiety in your body. It's a feeling of toxins inside, and I have learned as a woman that to give our future and our children a better life that I have to have a particular state of mind and to clean my body as much as I can of the toxins. If I'm in a state of war and I'm upset and stressed my child feels that and I give birth to that life on this planet. But if I'm able to retain a state of peace in my body and my heart and my mind, I'm giving birth to that. I'm giving birth to a better life. As a young woman and human of this planet, I care about creating healthier life for all of us, healthier land and healthier state of mind, which is so much more deeply tied together than just seeing the land as resources. No, the land is my skin. I feel the toxins and the firearms in Pohakuloa. I can feel the bombs like a cigarette burned into my own skin. I feel the land because I as a woman am giving birth to new life constantly and that potential for life that we all know exists beyond the barriers of our own skin. This life is inside of me as much as it is outside of me, and that state of mind is how we feel the land. You don't need to just ask us. You need ask the land. Ask how the land feels. Ask what it asks of you and listen. Because the world speaks, because the world has an electromagnetic energy field, just like we have an electromagnetic energy field, which indicates to us that it is alive. It is pulsing out vibrations for us to listen.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Kelsey Bunting		<p>And I want to make it clear that I'm not speaking to anybody as an enemy because I do not have a state of mind for a state of war. I speak to everyone here as brothers and sisters, and as brothers and sisters I love you. And I believe when we love someone we want to teach them. We do not just abandon them or scold them or exclude them from our society or our lives. We choose to show up and show and teach, try to walk with each other. And when we're able to accept that love that is given to us, when you accept that love that is given to you, you join the hui. You join the people, the community. And when you do that you learn, that you become also one with the land and the waters, and they are as much a part of you as your brothers and sisters. And Pohakuloa should be seen as such, even more than just a resource. Pohakuloa is not a resource. It is land, and it needs to heal. The military should not continue the lease. And additionally, it will be a continued legal act of the U.S. military occupying these islands. Mahalo.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Abilene Bushong		<p>An agreement was made for a time duration of your occupancy of the Pohakuloa Training area, and that time is coming to an end. Your time is up, honor your agreements and let the land go back to its natural state. You have poisoned the aina for decades and it's time to stop. This land does not belong to you and you are not entitled to continue using it once the occupation reaches its agreed upon end date.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Jeffrey Cabanting-Rafael		<p>I support the presence of Pohakuloa Training Center with some changes. I don't think it's fair to follow antiquated patterns of the past. A 65 year lease on \$1 is pretty horrendous no matter which way you look at it. The military can surely afford to pay more for occupying 2300 acres of land. The military installations on every island are quite important to our state's defenses as well as training for our military. Opponents of this I feel are entitled to their opinions and have strong personal and cultural reasons to oppose it, but in a matter of personal opinion - especially considering the state of the world currently - I would prefer to have a military base present in close proximity to our civilian populations. It's also of my opinion that if the people of this state are going to pay more in taxes for the land we own and occupy then our government should follow through and pay more for the land they occupy. I don't believe it's prudent to try and push out military installations on any island considering Hawaii as a state is an isolated series of land masses in the Pacific Ocean, but it also isn't feasible to expect the people of Hawaii to be expect be okay with 2300 acres of occupied land on a \$1 lease for another 65 years. Hunters and commuters alike use the road for leisure and daily life, The US Military should shoulder more than what it currently does to upkeep the roads and local economy.</p>	<p>Thank you for your correspondence. Your comment has been noted.</p>
Jeffrey Cabanting-Rafael		<p>I believe that anyone who poses a cultural issue with Pohakuloa may bring up valid points of "taking advantage" of the land, but I do not agree with "train their troops to go kill people..." and so on as stated in a recent news article from Hawaii News Now (which is how I found my way here). Majority of the service members who train there that I have met are all local, and of Hawaiian descent it's akin to calling our own people murderers. It is also noteworthy that many Hawaiians joined the service and had exemplary careers such as General Albert Kualii Brickwood Lyman whom Lyman Museum is named after, as well as the memorial display at Hilo International Airport. As much as our culture has diverged from what happened in the past, there is also a crucial part of our culture and people intertwined in it. The Lyman Brothers: Albert, Clarence, and Charles were all appointed by Prince Jonah Kuhio to attend West Point and represented the Hawaiian People in the US Military. Other names that seem to be passed by or simply forgotten are Captain Francis Wai (killed in action in WWII) who was a distinguished cross recipient, later upgraded to a medal of honor recipient posthumously, or Private First Class Herbert Pilila'au who was the first native Hawaiian to be award a medal of honor for his actions in the Korean War. Just a matter of opinion that I feel like people forget. In conclusion, I support Pohakulea remaining in it's current location with the understanding that I as an individual believe that the US Government should pay more of its fair share to our local government for the land they are using.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

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Commenter	Submitted By	Comment	Response
Shawn Cahill		<p>I trained at PTA from 1992-1996. I was stationed at Koneohe Marine Corp Air Station (Now KMCB) with 1st Battalion 3rd Marine Division Weapons Company 81's Platoon. PTA was our only live fire range except Schofield Barracks which I believe was shut down in 1994. Effectively making PTA our only live fire range. I can attest that without live fire capabilities it would drastically impair the infantry. The Army and Marines need to be trained in live fire training to become combat effective. There is a multi level platform on how a weapon operates, malfunctions, and percussion of the weapons to become proficient in that weapons system. It will drastically impair the effectiveness of the Soldiers and Marines of gun shyness from engaging in combat if live fire is taken away. The impact zone of weapons systems is in a safe zone where a'a and pa'hoihei lava field does not endanger the land. Literally breaking rocks into smaller rocks. It is clearly uninhabited and unusable area. Combat readiness is an important part of the Defence of United States of America. Hawaii was voted by Representatives of Hawaii to become a state. This is the home of the Pacific Fleet. Without it this would be under the rule of the Empire of Japan not a Hawaiian Monarchy. With respect to all Hawaiians, to efficiently protect the island we need a safe place to live fire for our troops. I believe respecting the Ai'na is very important. Respecting the local culture is important. It is as simple as trash, it has to go somewhere. The military has to have somewhere of low impact to Hawaii in order to train proficiently in order to protect Hawaii from foreign enemies. This is the 21st century not the 19th century. The world has changed and there are many extremist willing to take siege of opportunities to turn Hawaii into a communist or totalitarian state if the United States was not here guarding the islands. Yes the military is not perfect, nor is anything else. We need to work together to come to a common goal of working together for the best interests of Hawaii lands, Hawaii's people, the military, and it's civilians. I believe that PTA is a must need to keep our military in a state of combat readiness for the Pacific Fleet. It is a small piece of land, a small price to pay, to keep Hawaii safe from people who would do far worse if given the chance to exploit Hawaii lands. With all do respect, Shawn Cahill</p>	<p>Thank you for your correspondence. Your comment has been noted. The Army understands its responsibilities for proper stewardship of the land and has the utmost respect for Native Hawaiians.</p>
Phill Cain		<p>MILITARY OUT. Stop the desecration.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Lindsey Caldwell		<p>The United States and their military have abused Hawaiis people, land and resources for far too long. The military cannot be trusted not their operations. Falsified information, lack of transparency, and the total destruction of land are just a few of the major issues hawaii faces with military occupation. It's time to give Hawaiis land back to the true people of hawaii, the Kanaka. Pohakuloa is on the verge of becoming Kahoolawe, it's disgusting and disgraceful. Time to put an end. I DO NOT support the us military occupying and using ANY land in Hawaii. Driving through Pohakuloa everyday reminds me of this and will jump at any opportunity to get them out. Til the last ALOHA AINA!!!!!! Time to Shut down PTA for good!!!! Time to get the land back to its original beautiful state not the disgusting buildings, ordinance, broken trucks, air strips and other Opala/ Destruction they are leaving behind.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

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Commenter	Submitted By	Comment	Response
Ben Catriz		<p>My name is Ben Catriz. I'm a private citizen. My last name is C-A-T-R-I-Z. I don't represent nobody. I'm here basically to express my opinion and try to educate the Lieutenant Colonel on what everybody is trying explain to him. I have hunted in Pohakuloa. I think there is nobody that loves Pohakuloa more than I do. I hunted there since I was ten years old. Pohakuloa back then you drive along by the state park, you look to the left, you cannot see the old Saddle Road below. The trees were so thick. You had Mamane trees, fountain grass. Everything was alive in there. Now you drive through you can see the osero (ph.) downside. So basically whatever you guys are doing you are killing the mountain up there. It was never like that. That section over there, what's called Area 1, I hunted there with bow with my father, but I never did hunt in that area. It was so thick you wouldn't be able to see the sheep to shoot the arrows through to hit that animal, it was so thick. Now you look at that area, it's like a desert. Something is killing it.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Ben Catriz		<p>You drive on Saddle Road, it doesn't take a rocket scientist to figure out, look on the left into Pohakuloa, everything is dead. Look on the right towards Mauna Kea, it's alive. That's how Pohakuloa used to look on that side. You used to drive through, when you see -- people seeing the goats and the sheep. You couldn't see that. The fountain grass, the Mamane tree were so tall in there, you couldn't see it at all if they was right inside there. Now you can see all the way to the base of Pukaki Hill, which you couldn't see before. So just to educate you, Colonel, it's -- what it was before when I was ten years old to what it is now is like a rain forest turned into a desert. That is what the people are trying to say, you guys are killing the environment, and nobody is doing anything to make it any better. That's all I have to say. Thank you.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Ashley Cazemiro		<p>We cannot, with one breath, speak of reparations and with the very next continue to abuse indigenous land and people. No more.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Autumn Chong		<p>Living in Hawaiian homestead in Pu'ukapu, Hawaii, I feel the land shaking from the bombs blowing up at Pōhakuloa. I hear the bombs almost everyday from Waimea and it echoes. The water table is below the surface of the land, this is not new news. Military training in this area is contaminating the land, soil health, and water. Military training is a threat to Hawai'i island and the different communities that exist there: in the soil, native birds, native plants, archaeological sites, and more. There were 12 native birds when the military started training at Pōhakuloa, now only 9 survive. No attention to the health of flora, fauna, and people native of Pōhakuloa is a reflection of the lack of care, attention, and awareness of the military for Hawai'i. Only weapons, disruption, and killing of native Hawaiian communities is what the military does. This is not protecting, this is not learning, and this is not training. Facts don't lie and this is one of many ways that show the detrimental effects of military training in Hawai'i state wide and at Pōhakuloa. I do not support the renewal of the lease for military training. Do not renew this lease for the military! Natives of Hawai'i, born and raised, do not support this.</p>	<p>Thank you for sharing your concern. Native species are discussed in Section 3.3.4.3 and 3.3.4.4, impacts to native species are discussed in Section 3.3.6. Text within these sections has been revised and expanded to include natural resource management measures that the Army is implementing that benefit the land and protected species.</p>
Rachel Clyde		<p>Give Pōhakuloa back to native Hawaiians and remove the military from this land. The military is desecrating sacred land and destroying the environment.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Emily Collins		<p>Aloha.</p> <p>It is very apparent that military presence, training drills and usage of resources is damaging to our delicate ecosystem on Mauna Kea. We should be protecting and replenishing native species of birds and plants that have gone extinct. Instead, with military occupation and regular drill training, one could argue that it further detracts what is already so fragile.</p> <p>With everything that has happened with the fuel spills at Red Hill, it is safe to assume it is only a matter of time before a catastrophic incident poisons one of our islands largest water source. There is no possible way military occupation is safe or positive for our environment. Shut down PTA.</p>	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Joe Collins		Please remove the Ching and Kahalelio vs. Case from this document. So many wasted pages. If it need to be included, incorporate by reference.	Thank you for your correspondence. Your comment has been noted.
Olivia Collis		you disgusting deplorable military dingbats need to get off of Hawaiian land and leave local kanaka alone. You have ruined and raped the hawaiian islands for so many decades, and to actively continue this tradition by occupying this land and using it to train future bigots makes you evil.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Shannon Corbeil		<p>It is past time for the US military to withdraw its presence from the Hawaiian Islands. The negative impact of the military there is indefensible and unnecessary. The US Army has no reason to maintain a presence in Hawaii and the land should be returned to Native Hawaiians in order to help restore the environmental and cultural damage done by our occupation.</p> <p>Shannon Corbeil US Air Force Veteran</p>	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Raleigh Coulter		Return the land to the people of Hawaii and the state of Hawaii for clean up and conservative. No justice no peace!! Protect the 'aina.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Molly Crane		Please stop desecrating native Hawaiian land—this harms the environment and doesn't honor the indigenous culture and spiritual significance of the land	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Mike Davis		I fully support Alternative #1 and believe that perhaps Alternative #2 could be a consideration by the us army to return in kind lands not utilized like the pallila habitat or paprts if not all of the Keamuku parcel.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Amanda Dillon		<p>Army Training Land Retention at Pōhakuloa Training Area Environmental Impact Statement – Public Comment I am a resident living in Waimea and I have worked in the fields of environmental science and conservation for the past 14 years. I am concerned about the environmental impacts of excessive noise pollution, invasive species, unexploded ordnance, and contamination from the Pōhakuloa Training Area on biological and cultural resources, native and endangered wildlife, and our island community. Our home is 45 miles away from PTA and we can hear live-fire and bombing clearly here and all the way down to the coast. The noise of bombs detonating repeatedly throughout the day and into the night is alarming and distressing. The EIS should include a survey of residents across the island to collect information on noise pollution and its impact on their lives and families. The EIS should provide information on the extent of the noise pollution from PTA and public health impacts. The high-elevation, tropical, sub-alpine environment of the Pōhakuloa area, between volcanic mountains, is one of the rarest ecosystems in the world (U.S. Army). This rare ecosystem, with critical habitats and endemic species, that exist nowhere else in the world, is exactly why this land should be protected and preserved—not bombed. Pōhakuloa provides habitat for rare, native, and endemic plants, insects, and birds including 27 endangered species such as the nēnē (Hawaiian goose) and ‘ōpe‘ape‘a (Hawaiian hoary bat), the only native terrestrial mammal in the state. Military installations in the State of Hawai‘i, including Pōhakuloa Training Area, have the highest number of species listed under the Endangered Species Act in the country (Stein, B.A., Scott, C., Benton, N., 2008. Federal lands and endangered species: the role of military and other federal lands in sustaining biodiversity. Bioscience 58 (4), 339–347). The EIS should provide the current status and a complete inventory for all rare, native, endemic, endangered, and threatened plant, animal, and insect species in the area, along with all efforts to protect, preserve, and restore their habitats. The EIS should also provide an inventory of invasive species and methods used to prevent and control their spread.</p>	<p>An analysis of noise impacts with respect to the proposed action and alternatives is provided in the Section 3.7 of the EIS. Existing management measures are addressed in Section 3.7.4.1 and best management practices and standard operating procedures are located in Appendix E. An island-wide survey is beyond the scope of this EIS. Wildlife noise impacts are discussed in Sections 3.3 and 3.7.</p>
Amanda Dillon		<p>There is no evidence that the U.S. military needs the 23,000 acres of leased land or any of the land that comprises the Pōhakuloa Training Area. With modern military and technological capabilities, military bases abroad, and large installations on the mainland, it is no longer accurate that the state of Hawai‘i, or Hawai‘i Island specifically, is "strategically vital for national defense as a logistics hub and for rapid troop deployment in response to emergent world events." The EIS should provide specific evidence and examples of how the leased area and entire PTA is currently "strategically vital for national defense." The high-elevation, tropical, sub-alpine ecosystems of Pōhakuloa are unlike any other environment, or possible warzone, in the world. It is inaccurate to claim that the unique environment at PTA is "critical to prepare our troops to 'fight as they train' in similar conditions to which they may be deployed." The EIS should explain why PTA and the leased area are necessary for training when the U.S. military has large installations on the mainland, in remote areas with mountainous and desert conditions. If the Army insists on listing financial benefits in EIS documentation and lease negotiations, it should be noted that the U.S. military claims to contribute "a significant number of jobs and money" to the County of Hawai‘i, but employs only "240 personnel on the Island of Hawai‘i." Therefore, the military provides employment for approximately 0.1% of Hawai‘i Island residents, yet controls 132,000 acres that is the "largest contiguous live-fire range and maneuver training area in Hawai‘i." Per the online documentation, this is also "the only training area in Hawai‘i able to support larger unit (i.e., battalion and brigade) collective live-fire and maneuver training." PTA has the largest land area and the greatest environmental impact with smallest economic benefit for the community.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

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Amanda Dillon		<p>The EIS should explain how PTA, and specifically the leased land, provides economic benefits for residents and provide specific details for the "jobs and money" contributed to Hawai'i County. If the U.S. military is going to claim financial benefits to the County of Hawai'i as part of lease negotiations, the EIS should include a socioeconomic survey of residents. As part of the EIS, the Army should ask residents if the economic benefits outweigh the cost to the environment, public health impacts, and the importance of biological and cultural resources in the area. As stated in the EIS Scoping Presentations, "PTA is the only training area in Hawai'i where military units can use weapon systems at maximum capabilities." It is unacceptable for the military to deploy weapons near our homes, fragile critical habitats, and endangered species—especially at "maximum capabilities." ?The EIS should fully disclose the extent to which the U.S. Army has fulfilled lease requirements and legal obligations to remove ammunition and waste materials. The EIS should provide an inventory of the entire lease area to determine if there is ammunition, unexploded ordnance, depleted uranium, lead, toxins, or other military debris. The U.S. military has not proven that the leased land or entire Pōhakuloa Training Area—a rare, fragile ecosystem with endemic species and cultural resources—is necessary for national defense or the safety of our country.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Amanda Dillon		<p>I fully support the "No Action Alternative" wherein the Army would not retain any of the State-owned land at Pōhakuloa Training Area?. The environment should be restored to its natural condition and returned to the Department of Land and Natural Resources when the lease expires in 2029.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Sky Doherty		<p>As a long time resident and photographer on the Big Island, I'm regularly disappointed at the vast and beautiful landscape that is take over by the training area.</p> <p>This is our island, and some of its most beautiful landscape is off limits due to the training area boundaries. Perhaps the area can be more limited, so that the Pohakuloa Game Management Area to the South of the highway is open to the public. The vast trails and cinder cones in that area are a treasure to our community.</p>	<p>Recreation on PTA is discussed in Section 3.2.4.2.</p>
Pete Doktor		<p>In interest of precious time, I will keep this brief: I vehemently oppose the renewal of land leasing by the US military, as both an Army veteran and an `ohana living in Hawai'i. As an Army medic in the late 1980s, I personally engaged in massive destruction of public lands at multiple locations including Piñon Canyon, Colorado; Yakima, Washington; Mojave Desert as a young combat medic in training. This included destroying natural habitat and wildlife with armored personnel carriers that served as our ambulances. The EPA would have to shut us down periodically due to this routine training devastation to let areas recover from our damage.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Pete Doktor		<p>These were routine operating and training procedures, often without any supervision. Knowing what damage the US military conducts as a matter of routine exercises, it deeply concerns me when such destruction is human error accidents — like the many so-called "controlled burn" activities such as at Mākua Valley on O'ahu that have went out of control with devastating consequences, or by young soldiers engaging in unbecoming behavior. I start and end with this personal testimony on the matter of renewing military leases rather than dig into the details of the draft EIS because for whatever rhetoric it contains, my own experience both as an Army medic and as a resident of Hawai'i does not buy military assurances of being a "good neighbor." The fact that they've used this expression for so-long and continue to do so, underscores how out of touch with reality the military rhetoric is. "Good neighbors" do not dictate to or poison the neighborhood. "Good neighbors" clean up their messes and pay for all their liabilities (not at tax payers expense).</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Pete Doktor		<p>"Good neighbors" do not destabilize the neighborhood by inviting foreign hostilities due to blowback by their operations. "Good neighbors" pay fair market on land, and do not get governmental favoritism, like securing tens of thousands of acres of land for one dollar, in contrast to what the neighbors have to pay. And any neighbor who waged war against the local ecosystem would be held responsible for criminal behavior. By those standards, the US military cannot be a "good neighbor" by definition, regardless of military or political rhetoric or restrictions. Its mere presence under routine operations and training violates these community standards for public health and safety.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Pete Doktor		<p>And this does not go into the fact that this "neighborhood" is considered sacred to many in the aboriginal nationals; this "neighborhood" happens to be like a church for many K?naka Maoli, underscoring the fact that objectively speaking, this is a military occupation of a sovereign nation technically. Rhetoric over "national security" does NOT trump genuine human security, which is not secured through ballistic missiles but a peaceful foreign policy that commands skilled leadership for diplomacy and conflict resolution — not conflict escalating, as military exercises do. Nor, do such political, nationalistic policies trump the democratic voices of the very citizens the military is commissioned to protect.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Pete Doktor		<p>Instead, the devastation without any clean up at P?haku?loa and its history of toxicity such as depleted uranium poses a threat to public health and safety, as does its presence invite retaliation from actors with legitimate grievances with US foreign policy. My opposition to the renewal of military leases at P?haku?loa is not ideological because I understand the argument for reasonable protection of one's borders. However, it is for that reason and my experience as a soldier that US intervention militarily and otherwise does not make us safer, nor does training in such an environmentally and culturally sensitive region such as P?haku?loa.</p>	<p>Section 3.5.4 describes cleanup of hazardous substances and hazardous wastes within the State-owned land.</p>
Pete Doktor		<p>Moreover, the expanding of military plunder to foreign militaries in RIMPAC exercises further alienates the use of P?haku?loa for local residents as it makes Hawai'i a center for war preparations, rather than a center for international peacebuilding by civil society it needs to be if we are to secure peace through the islands, and not a constant site for military retaliation or offensive operations. Also, as mentioned in the beginning, my experience as a combat medic confirms that even "peacetime" military training is highly destructive, and should not be permitted in such ecosystems as Hawai'i that is one of the endangered species centers in the hemisphere. As the military concentration of Pearl Harbor demonstrates, it ultimately does not facilitate conflict resolution, but ultimately results in deaths such as those who perished in Imperial Japan's attack on legitimate military targets in O'ahu. We may be even less lucky in a retaliation by China or Russia — and such an event would partially be the fault of those who argued for military concentration in Hawai'i.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Pete Doktor		<p>So as a former soldier from an illustrious military family, I plead with the DoD: please withdraw your occupation and let the people of Hawai'i be and cultivate a center for aloha, not war. If there is any integrity as a "good neighbor" it would reside in its own neighborhood — not impose itself on sacred areas such as P?haku?loa, M?kua Valley and so on. Why not be a "good neighbor" and respect other neighbor's churches and historical communities? No more military favoritism, such as the one dollar leases at P?haku?loa: nothing can reek more of militarism collusion: listen to the people, not the politicians.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

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Bob Douglas		<p>The PTA lease should not be extended. Three main reasons.</p> <ol style="list-style-type: none"> <li>1. The bombing and artillery are incredibly devastating to the area. The destruction can never be remediated.</li> <li>2. Depleted uranium and current/future munition byproducts are entering watersheds. We are witnessing in real-time a future superfund site.</li> <li>3. This is sacred land. Belongs not to the State but rather the Native Hawaiians. The trust was violated. It's high time to recognize and honor the true heirs to these lands.</li> </ol>	<p>Thank you for sharing your concerns. In accordance with the lease, and under the provisions of existing law, the Army retains responsibility for cleanup and restoration of former training areas. After the lease expires, the Army will follow Army regulations to determine how and when the cleanup and restoration will occur, following the CERCLA process.</p> <p>Sections 3.5 and 3.6 discuss depleted uranium. Section 3.5.4.12 clarified to indicate surveys found no indication of depleted uranium-containing materials on the State-owned land.</p> <p>Section 3.5.4.11 notes that the migration of munitions constituents at PTA is limited due to limited surface water and groundwater pathways because of low rainfall, lack of perennial streams, and the deep depth to the groundwater aquifer.</p>
Bob Douglas		<p>As a US Army vet I am totally opposed to extending the lease. Those munitions contain hazardous and dangerous materials that will or have started to enter the aquifers. This land belongs to the Native Hawaiians and none I have contact with want the lease for PTA extended. To them it's sacred ground that needs to be restored and returned to them. Please respect the wishes of the host culture. You are a guest here, not the owner.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Ipolani Duvauchelle		<p>The military needs to give up its occupation of stolen land back to Hawaiians. The military presence is inherently violent. Our land rejects violence and our people reject violence; we are full of aloha. Please stop the military training at Pohakuloa.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
McLean Eames		<p>I choose the EIS option 4, the no action alternative, to not renew the lease for pta. The impact on significant cultural and historical sites and activities is too severe. I appreciate our military, but we can do better than what is occurring at PTA. Mahalo for your consideration for my comment.</p>	<p>Thank you for your sharing your concerns. The Army understands its responsibilities for proper stewardship of the land and has the utmost respect for Native Hawaiians and cultural resources. Please see Section 3.4 (Cultural Resources) of the EIS for more information.</p>
Kerry Eastwood		<p>I urge you to let your lease lapse or renew the lease on the least amount of acres possible. The Hawaiian people deserve to have their culture honored and their wishes for their land honored. The US should be a partner in peace with the Hawaiian Islands - not a colonizer of them. It's time to Move beyond this archaic practice and allow other cultures to flourish instead of extracting them like a resource to be had.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Mina Elison		<p>Mahalo for the opportunity to submit comments on the Draft EIS for the Army Training Land Retention at Pōhakuloa Training Area. I stand in strong opposition to the retention of 23,000 acres of land to the Army as the presence of this military operation has significant negative impact to Kanaka Maoli and our ability to exercise important cultural and religious practices which connect us with our ancestors and our descendants. Actions of the army on our beloved 'aina have displaced Hawaiians and permanently altered and destroyed the natural flora, fauna and unique ecosystems which once flourished in the area. Please listen, with an open heart, to our pleas to malama 'aina and one another. Me ka ha'aha'a, Mina Elison</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Lucy Emerson		<p>I'm really hoping this does not go through. As a concerned citizen, I would like you to strongly consider the ethics of taking peoples land when it doesn't belong to you. This isn't moral. Imagine how you would feel if someone came to your home and said "this is ours now" and pushed you out of your own surroundings? If that sounds cruel, you should reconsider what you're doing.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Louise Fa		<p>We do not want this. We do not need this. We do not want what is happening on red hill to happened on the north shore. Do not build this.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Jade Figueroa		<p>Pōhakuloa is sacred land. It's physical and cultural preservation is most important to native Hawaiians. The draft EIS is ultimately HARMFUL, Disrespectful, and not in Favor of the people who live in the area and who want to protect it. I'm opposed to this draft and I stand as an ally with native Hawaiians who want to keep the land free of destruction and military occupation.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

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Commenter	Submitted By	Comment	Response
Greg Fleming		<p>Thank you, good evening. My name is Greg Fleming, F-L-E-M-I-N-G, and I'm a citizen here in Hilo, Hawaii. I rise in support of course of action number 1, which is full retention of the training lands at PTA, and I do so from a perspective of my service to the Army and knowing full well of the importance of PTA to both the Army, the Navy, the Air Force, Special Operations. The National Guard that is trained up at PTA. From that perspective, I would say that we owe it to the sons and daughters of Hawai'i to make sure that they are well trained, if they were to go out on any contingency operations and to bring them home safely, and PTA does that, and I believe that course of action 1 does it best.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Greg Fleming		<p>The issue with course of action number 2, which is a partial retention, is that it fragments PTA and leaves portions on the north side of PKI, critical infrastructure on that other side. It also leaves that area not available for any future considerations, for any likely fielding of equipment or capabilities that may be used somewhere to threat Chinese aggression in the Pacific, the mid-Pacific. Course of action number 3 does not -- or is fragmented and does not allow for operational consideration in terms of the road network that would have to be maintained and managed. And I believe that would be the most difficult piece. And without doubt, I want to recognize the men and women at PTA working the environmental, ESA environmental section, the ESA and the Section 7 that goes with it, as well as any consideration for the cultural resources that are up there and working issues related to that. And I believe that they have done so in a superb job and should be acknowledged. I'd like to see that continue for all the lands under the full retention. And that's it. Thank you.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
E, Kalani Flores		<p>I wasn't going to come tonight, because we come to all these hearings and give testimony. Nothing ever comes of it. So why even come? But I just turned on the computer, I saw Aunty Max, and I said, I have got to come down here to support Aunty Max and Kako (ph.) everything she said and everything everyone else said. And then if Aunty Max and Kako can be here I better get down here and just support what they are saying. Mahalo. I'm sorry I missed all the testimonies provided earlier and comments. We live in Puukapu Waimea, our ohana, or our sinkase (ph.) ohana. We've been to Pohakuloa a number of times. I have served on the Pohakuloa Cultural Advisory Committee for a number of years under various different commanders. I have been on the land, done practices on the land, and know Pohakuloa. I haven't had time to review that whole document, but from a quick glance at it, there is some problems with the EIS. And it's not just this EIS. It's all the EISs that have been done. The Army for PTA has not done a comprehensive EIS for the entire activities happening at Pohakuloa. You are piecemealing the EISs, and that's against the rules and laws of the intent of an EIS. You cannot do an EIS for just this boundary authorization. You have to do an EIS for everything you are doing on the property there, on the lands there. You are piecemealing the EIS process. I know that's against the rules and the laws of the process of NEPA. I have made those comments a number of times for all your projects. Not all your projects, but a number of your projects. You are piecemealing all these little EAs, and EISs. You are supposed to do a comprehensive EIS for an entire area that you are using, not just this one little section.</p>	<p>As discussed in Section 2.1, the Proposed Action is limited to retention of the State-owned land at PTA in support of continued military training. Additionally, the Proposed Action is a real estate action (i.e., administrative action) that would enable continuation of ongoing activities on the retained State-owned land. The EIS analyzes the potential impacts from continuation of ongoing Army activities on the State-owned land.</p> <p>As recommended in DHHL comments, the EIS has been revised to remove the 250 acres of DHHL-administered land from Alternative 1. Consequently, the 250 acres of DHHL-administered land are no longer considered for retention by the Army in any alternative.</p> <p>The EIS has been revised to clarify the ongoing activities (with prior NEPA documents cited) to demonstrate that the current and proposed uses are the same; and to identify ongoing best management practices, standard operating procedures, management measures, and mitigation measures in support of those activities to highlight the Army's ongoing environmental monitoring and conservation efforts.</p>

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E, Kalani Flores		<p>That's one of the problems with what I saw in the EIS. The EIS lacks a Comprehensive Cultural Impact Assessment. You guys have not done any -- I read the EIS Cultural Impact Assessment. It's incomplete. You just took a few reports here and there. You regurgitated and you threw it as a CIA. It's incomplete in this EIS. There is no oral histories, no cultural practitioners that have been consulted or included in that CIA. And it's not the first time. It's every time. You guys have not -- when I say you guys, I'm saying the Army has not done any type of appropriate traditional cultural properties assessment for Pohakuloa. There was some small -- little report done a few decades ago, nothing recent, and even that report was inadequate. This is not new. I have been saying this for decades, too, at hearings and comments on your reports and other projects at PTA. So here I have got to come again, say the same thing over and over. And it's going to be rubber stamped all the way through. We know the process. But I came here for Aunty Max. I saw Aunty Max, and she said Uncle Ku was here, so I better come down here. The significance of Pohakuloa, if you guys don't understand, it's the center piko of this Island of Hawaii, of this moku keawe. It's the center, piko, P-I-K-O. The energetic piko sits right in the middle of the island, right within the area of Pohakuloa. There is energy lines around the east, west, to intersect at a pu'u called Pu'u Koli. The energy lines run from Ha'ena to Ahu-ena, and then go from north to south, these energy lines, and they intersect right up to Koli. It's the piko, the center energetic piko of this island.</p>	<p>Section 3.4.4.4 of the EIS and Sections 5.0 and 6.0 of the CIA have been revised to reflect additional information provided by interviewees who responded to a second request for input in December, 2022, following the height of the COVID-19 pandemic.</p> <p>Section 3.4.2.1, ("Evaluation of Traditional and Cultural Properties Under NHPA") clarifies that this EIS complies with the requirements of NEPA and HEPA and does not address compliance requirements under NHPA or HRS Chapter 6E.</p>
E, Kalani Flores		<p>And you guys -- so what are you guys doing there? They are causing a -- not just the physical destruction of the land every time you bomb it, shoot at it, but you are also causing an energetic disturbance on our island that has far more repercussions than you can understand. And some of those -- so you have physical disruption, destruction, desecration happening, but you also have the energetic disruption and disturbances happening there. Every time you bring forces and personnel on the lands of Pohakuloa, you are leaving an imprint, an energetic imprint of hate, war and hostility on our lands, and you guys are responsible for that. So you are causing the physical and the energetic disturbance in the middle of our island, and it sits in the middle of a significant water aquifer in the middle of this island here. How do I know some of these things? It's from EK Kupuna. EK Kupuna, ancestral insight and knowledge given when I have been on the land of Pohakuloa. There are Kupuna there, there are divine beings and others there that are giving us insight about this area of Pohakuloa. And you guys have been mistreating it, destroying it, desecrating it more than you really can understand, and I'm just hear says enough is enough. You cannot continue doing this on our lands, and it's not even our lands. It's the lands of the creator, ke akua. They put these lands here, and you guys are causing far more desecration and destruction than you could even put in your EIS incomplete report. So I'm just here to say stop it already, because you are accountable. Each individual is accountable for what you do. And now you know. I'm just say once again, enough is enough. We're going to stand for Pohakuloa and all the lands and to the ocean to protect what we need to protect, because we as kanaka have the responsibility and kuleana to do so. That's all I have to say for tonight.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
E, Kalani Flores		<p>And I want -- actually, this is a request now. I'm requesting that all your reports, archeological reports and surveys that have been done for Pohakuloa or PTA area, all the natural botanical and biological reports be posted online so we can easily access these reports. There is numerous reports that nobody has access to. And if you are going to do these EISs then the public should have access to all these reports and you should make them available online in some form or fashion. That's my request. A hui hou.</p>	<p>To the extent feasible, current on-line URL links are provided in Chapter 6 (Reference List) following the reference citation. The USAG-HI website for current publicly releasable documents is: <a href="https://home.army.mil/hawaii/index.php/ptaais/public-info">https://home.army.mil/hawaii/index.php/ptaais/public-info</a>.</p>

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E. Kalani Flores		<p>And mahalo. So you know the comments and things that have been directed against the Army and the personnel and military, it's not really against you folks personally. So we just want to make that, note that. It's just what the actions you are doing. So it's not against -- this is not against the military or the Army or the individuals who aren't part of the Army or the military. It's the actions you are doing that we don't agree with, not just agree with, but we cannot continue to condone. So we still have Aloha for you folks, whoever you are. And that's the strongest gift that this island and the kanaka and other people that are connected to this island have to offer to the rest of the world, that we have to offer Aloha and the peace and the lokahi to all the world, so that there is no war, that we can live in harmony with each other and live in harmony with the land and the sky and the heavens and the oceans and the waters. So this is what the pule is for, to have Aloha for all and to replant the seed of peace and maluhia and lokahi amongst all, and that we all walk in a way that we are mindful of what we do to keep the harmony with all things. And that's what the pule is going to be. (Whereupon, a Pule was given asking for forgiveness, peace, harmony and unity amongst everyone present and on the land, that love is shared amongst everyone with the land forever.) Pa'i kalima. Pa'i kalima. Aloha no.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Flores-Case 'Ohana		<p>SUMMARY OF COMMENTS. The Flores-Case 'Ohana provides the following substantive comments to this Draft Environmental Impact Statement (DEIS). Overall, the DEIS is incomplete, inadequate, deficient, and fails to be in compliance with the National Environmental Policy Act (NEPA) and Hawaii Environmental Policy Act (HEPA) as well as other relevant rules and statutes. This DEIS fails to accurately describe the affected environment by limiting the Region of Influence (ROI) and the scope of discussion regarding certain resources to only the parcels of State-leased lands by excluding the other adjacent and relevant lands of the Pōhakuloa Training Area (PTA). Thus, the environmental consequences lack a thorough discussion of the environmental effects and their significance.</p>	<p>The EIS has been revised to 1) include HEPA-specific section headings for clarity, 2) more fully identify mitigation measures, SOPs and BMPs adhered to by the Army as defined in previous NEPA-HEPA documents, and 3) provide analysis of resources where effects may vary based on retention estate (fee simple title and lease).</p>
Flores-Case 'Ohana		<p>The U.S. Army is not in compliance with the National Historic Preservation Act (NHPA). A comprehensive archaeological inventory survey for PTA including the State-leased lands has failed to be conducted. This has resulted in a number of eligible historic properties not being nominated to the National Register of Historic Places (NRHP). Also, the U.S. Army has failed to complete an accurate assessment of Traditional Cultural Properties (TCPs) and properties of traditional religious and cultural importance (PTRCIs) to Native Hawaiians within PTA. In addition, a required Section 106 consultation process has not been done for this DEIS.</p>	<p>EIS Section 3.4.2 documents that ongoing activities at PTA have been taken into account through the Section 106 consultation process, and are documented in a 2018 programmatic agreement to resolve adverse effects.</p> <p>Section 3.4.2.1, ("Evaluation of Traditional and Cultural Properties Under NHPA") clarifies that this EIS complies with the requirements of NEPA and HEPA and does not address compliance requirements under NHPA or HRS Chapter 6E.</p>
Flores-Case 'Ohana		<p>There are deep concerns about the health issues for this land and our people as the result of PTA being contaminated with military munitions that may potentially have soil, groundwater and surface water contamination from munitions residues (including explosives and heavy metals, chemical warfare agents or depleted uranium). These residues may derive from partially detonated and decomposing ordnance and explosives from training activities, flares, smoke grenades, open burning and open detonation disposal activities, munitions burial sites, weapons testing or other military activities. Although initially denied by the U.S. Army, it has since been documented that the military used munitions with depleted uranium (DU) during the 1960's within PTA. Likewise, there are concerns about the disbursement of lead from the ammunition of small arms firing from past and ongoing training activities. Also, it's highly likely that spills or dumping of toxins have occurred at PTA. All of these environmental impacts have occurred right over a major water aquifer on Hawai'i Island.</p>	<p>Groundwater and surface water quality are discussed in Section 3.9 of the EIS. Limited surface water and groundwater pathways on State-owned land pose minor potential impact to soil and groundwater quality.</p>

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Flores-Case 'Ohana		Also, we have recently witnessed the Navy's fuel storage tanks at Red Hill, poisoning a major water aquifer on O'ahu. What is presently happening at PTA is what was happening on the island of Kaho'olawe when it was used for live-firing training and as a bombing target by the U.S. Navy and other military forces. Except that the size of PTA is nearly four times as large as Kaho'olawe. Despite several decades and \$400 million in funding, it was impossible to clear Kaho'olawe of unexploded ordnance.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Flores-Case 'Ohana		Situating within a sacred space held between Mauna a Wākea, Mauna Loa and Hualālai is a key cultural, energetic, and spiritual area in the center of Hawai'i Island. There are significant cultural and historic sites within this landscape. Ancestral guardians of this land have made their presence known and shared 'ike kupuna (ancestral insight and knowledge) regarding the energetic piko of our Moku o Keawe (Hawai'i Island). In earlier times, there was a group of elderly men who would walk along these energy lines that run east-west and north-south, intersecting at Pu'u Koli within PTA, in addition to an energy line that encircles the entire island. Our kupuna walked upon these lines of energy because they knew the significance of maintaining them. Lines such as these are part of the energy grids that sustain the vitality and health at many different levels for this island and its people. Figures: Cultural landscape and sites at Pu'u Koli that are eligible as a TCP/PTRCI/ATI.	Section 3.4.2.1 of the EIS ("Evaluation of Traditional Cultural Properties Under NHPA") describes the status of Traditional Cultural Properties at PTA.
Flores-Case 'Ohana		The analysis of cultural resources in this DEIS is inadequate and incomplete as the ROI for the historic and archaeological resources was reduced to only the State-leased lands and not the entire geographic extent of PTA as required by the NEPA and HEPA regulatory framework and laws. At the minimum, an archaeological inventory survey should be done for all State-leased lands that are being considered as alternatives in this DEIS. However, this has not been done. Also, the U.S. Army should make the surveys and reports listed in the archaeological literature review of this DEIS accessible to members of the public to review by posting digital copies online. Without such access to these documents, the public doesn't have the ability to make adequate and thorough comments pertaining to the potential impacts upon the cultural resources within PTA. In addition, without access to these documents, information presented in this DEIS can't be verified for accurateness and completeness.	EIS Section 3.4.4.3 has been revised to describe why certain areas have not been surveyed. Figures have been refined to show where surveys have been completed, and the general locations and types of sites within state-owned lands.  To the extent feasible, current on-line URL links are provided in Chapter 6 (Reference List) following the reference citation. The USAG-HI website for current publicly releasable documents is: <a href="https://home.army.mil/hawaii/index.php/ptaais/public-info">https://home.army.mil/hawaii/index.php/ptaais/public-info</a> .
Flores-Case 'Ohana		This DEIS lacks a comprehensive archaeological analysis as it only included a limited literature review of previous archaeological reports. Upon examination of this Archaeological Literature Review (ALR), it's very apparent that over the past several years, the U.S. Army has only done project specific archaeological inventory surveys and failed to complete a comprehensive archaeological inventory survey for the entire PTA. There has been a piecemeal approach, thus avoiding an appropriate analysis of the cumulative impacts upon the historic sites and cultural resources of this area.	An archaeological inventory survey of all of PTA is beyond the scope of this EIS.
Flores-Case 'Ohana		According to a 2018 Programmatic Agreement (2018 PA), the identification of potential historic properties through intensive pedestrian archaeological surveys have only been conducted on about 45% of the accessible land (approximately 81,000 acres outside of the high hazard Impact Area) at PTA. As of the signing of this 2018 PA, only about 31% of the identified archaeological type properties at PTA had been evaluated for NRHP eligibility. The remaining 69% of known archaeological properties distributed across the accessible land were to be treated as eligible for the NRHP and adverse effects avoided in accordance with AR 200-1 Part 6-4(b)(9). Similarly, of the approximately 23,000 acres that comprise the State-leased land, inventory surveys have only been conducted on about 52% or 12,050 acres. The remaining 11,920 acres are unsurveyed.	EIS Section 3.4.4.3 has been revised to describe why certain areas have not been surveyed. Figures have been refined to show where surveys have been completed, and the general locations and types of sites within state-owned lands.

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Flores-Case 'Ohana		The nature of this DEIS that would trigger a Section 106 undertaking would also warrant a more comprehensive cultural resources study and archaeological investigations for the State-leased land. Likewise, the U.S. Army has failed to conduct aerial inventory surveys using drones or other aircraft for remote or inaccessible areas, including unsurveyed areas, despite having the technology and means to do so. The ALR has omitted significant figures under the false pretense that it's sensitive information. How can maps showing survey coverage of previous archaeological studies be considered sensitive?	EIS Section 3.4.4.3 has been revised to describe why certain areas have not been surveyed. Figures have been refined to show where surveys have been completed and the general locations and types of sites within state-owned lands.
Flores-Case 'Ohana		Without the ability to review these omitted maps, the public doesn't have the ability to make adequate and thorough comments pertaining to the potential impacts upon the cultural resources within PTA. Updated copies of these maps should be included in the EIS. There aren't any practical reasons why identified archaeological sites and cultural resources couldn't be shown on a map similar to Figure 1-3: Pōhakuloa Training Area Training Areas and Features or Figure 2-1: Training Areas and Facilities on State-Owned Land (DEIS pp. 1-13, 2-3). Especially since previous EISs have included maps that showed archaeological studies and sites within PTA without fully disclosing their precise locations. [See Figures 3.10-3, 3.10-4, & 3.10-5 from the FEIS Military Training Activities at Mākua Military Reservation, Hawai'i, June 2009. (FEIS MMR 2009)] It appears that this DEIS is failing to disclose that a large portion of the previously surveyed area within the State-leased lands has identified "Archaeologically Sensitive Areas" with numerous "Recorded Archaeological Sites."	EIS Section 3.4.4.3 has been revised to describe why certain areas have not been surveyed. Figures have been refined to show where surveys have been completed and the general locations and types of sites within state-owned lands.
Flores-Case 'Ohana		The U.S. Army has not completed an accurate and thorough assessment of Traditional Cultural Properties (TCPs) and properties of traditional religious and cultural importance (PTRCIs) to Native Hawaiians within PTA, including the State-leased land. Some of the previous archaeological studies have identified Areas of Traditional Importance (ATI) that might be potential TCPs and/or eligible as formal PTRCIs within PTA. Likewise, landscapes that are connected to the Native Hawaiian culture are considered ATI. However, cultural landscapes have not been formally evaluated at PTA. (FEIS MMR 2009, p. 3-303).	Section 3.4.2.1, ("Evaluation of Traditional and Cultural Properties Under NHPA") clarifies that this EIS complies with the requirements of NEPA and HEPA and does not address compliance requirements under NHPA or HRS Chapter 6E.
Flores-Case 'Ohana		Consultation with Native Hawaiian organizations, and other interested groups and individuals to assess the cultural significance of these properties and their NRHP eligibility has not occurred. The DEIS and associated reports, including the ALR, failed to include any narratives and information on these matters. Although the CIA does list some wahi pana as PTRCI, the list is incomplete. In other documents prepared for the U.S. Army, they have identified 'Areas of Traditional Importance' (ATI) that have not been formally evaluated at PTA.	Section 3.4.2.1, ("Evaluation of Traditional and Cultural Properties Under NHPA") clarifies that this EIS complies with the requirements of NEPA and HEPA and does not address compliance requirements under NHPA or HRS Chapter 6E.
Flores-Case 'Ohana		Trails are key in identifying cultural resources and sites within PTA as also noted in the ALR. Archaeological evidence suggests that many of the site types identified within PTA may be associated with travel corridors through the region (Robins et al. 2006; Shapiro et al. 1998; Williams 2002). (p. 8) Temporary and repeated-use habitation site types are typically located along trails running through the Saddle Region and near important upland resources, such as quarries, lava tubes with drip water sources, and bird nesting areas. (p. 39) Despite this reference, the ALR only showed one such trail in Figure 5 associated with 'Umi and failed to identify other trails and travel corridors through this region. Also, the identification and narratives of other trails/roadways that would fall under the Highways Act of 1892 are noticeably missing from the reports.	Sites within the cultural resources region of influence are presented in Section 3.4.4.4. Sites outside of the State-owned land are beyond the scope of the EIS.

## Responses to Draft EIS Comments

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Flores-Case 'Ohana		Cultural Impact Assessment (CIA) prepared by Honua Consulting cites the ethnographic study by Patrick McCoy and Maria Orr, Final Report: Ethnographic Study of Pōhakuloa Training Area and Central Hāmākua District, Island of Hawai'i, State of Hawai'i, (November 2012). However, this report is considered very incomplete and inaccurate as it pertains to traditional cultural properties (TCPs) within PTA. This study was extremely limited in its ethnographic scope, oral histories, and archival research that was utilized in the analysis of TCPs. In addition, this study failed to properly consider significant cultural landscape features such as pu'u as being TCPs. Despite several other EISs and surveys having identified potential TCPs within PTA, the archaeological firm and authors of this report, with limited or no previous survey experience within PTA, have systematically dismissed previously identified TCPs.	Section 3.4.2.1, ("Evaluation of Traditional and Cultural Properties Under NHPA") clarifies that this EIS complies with the requirements of NEPA and HEPA and does not address compliance requirements under NHPA or HRS Chapter 6E.
Flores-Case 'Ohana		Although the authors of the report have apparently at least looked at National Register Bulletin 38, there is little evidence that they've made any reasonable effort to identify potential TCPs by following the guidelines and methods set forth in this bulletin. Instead, it appears that they have cherry-picked concepts, and in some cases made them up, to support their conclusions that TCPs are non-existent within PTA. Thus, providing an ostensibly authoritative basis for writing-off TCPs within PTA and perhaps more importantly, allowing military activities and undertakings to move forward within an environmentally and culturally sensitive landscape.	Section 3.4.2.1, ("Evaluation of Traditional and Cultural Properties Under NHPA") clarifies that this EIS complies with the requirements of NEPA and HEPA and does not address compliance requirements under NHPA or HRS Chapter 6E.
Flores-Case 'Ohana		In addition, as noted in Section 2.1 of this report, it lacked any direct consultation with Native Hawaiian organizations (NHOs), Office of Hawaiian Affairs (OHA), or cultural practitioners in the identification of TCPs. Likewise, field inspections with NHOs, OHA, or cultural practitioners were not done. This report was done in a method that is in contradiction to guidelines set forth in Bulletin 38 as noted below (emphasis underlined): <u>Contacting traditional communities and groups</u> An early step in any effort to identify historic properties is to consult with groups and individuals who have special knowledge about and interests in the history and culture of the area to be studied. In the case of traditional cultural properties, this means those individuals and groups who may ascribe traditional cultural significance to locations within the study area, and those who may have knowledge of such individuals and groups. Ideally, early planning will have identified these individuals and groups, and established how to consult with them.	Section 3.4.2.1, ("Evaluation of Traditional and Cultural Properties Under NHPA") clarifies that this EIS complies with the requirements of NEPA and HEPA and does not address compliance requirements under NHPA or HRS Chapter 6E.
Flores-Case 'Ohana		Conclusively, this Ethnographic Study of PTA is deficient in its identification of TCPs within PTA and should not be cited or referenced in this DEIS or CIA to substantiate any conclusions pertaining to TCPs. This report further affirms that the lack of sufficient archaeological survey work, information, and mapping has prevented the U.S. Army from completing the NRHP nomination process for known historic properties within PTA.	Section 3.4.2.1, ("Evaluation of Traditional and Cultural Properties Under NHPA") clarifies that this EIS complies with the requirements of NEPA and HEPA and does not address compliance requirements under NHPA or HRS Chapter 6E.
Flores-Case 'Ohana		Very little new information and archival research was included about the Mauna Loa region even though the boundaries of PTA extend up its slopes and the ahupua'a of Ka'ohe extends up to its summit and Moku'āweoweo caldera. Similarly, there is a lack of cultural information about the region of Hualālai. The CIA only included one interview as part of this report and thus lacked adequate information as well as engagement with NHOs and cultural practitioners.?	Section 3.4.4.4 of the EIS and Sections 5.0 and 6.0 of the CIA have been revised to reflect additional information provided by interviewees who responded to a second request for input in December, 2022, following the height of the COVID-19 pandemic.

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Flores-Case 'Ohana		The information in Tables 4, 5, 6, and 15 of the CIA has been presented in an unorganized and inaccurate manner. Firstly, the listing of place names should be listed in alphabetical order so that they can be more easily searchable. The listing appears to be unorganized and done randomly. Also, it's suggested that the place names in Tables 4-6 be combined into one table/list and include another column that identifies the map(s) or sources. Place names/wahi pana from other earlier maps and other sources should also be included in the combined table/list. This would make it much easier for someone from the public to review and analyze the research. It is very apparent that Tables 4-6 are missing several noted wahi pana such as Kūkahau'ula (summit), Waiau (lake), Lilinoe (spring), etc. Also, Table 15 is missing the unnamed pu'u within PTA.	Section 3.4.4.4 of the EIS and Sections 5.0 and 6.0 of the CIA have been revised to reflect additional information provided by interviewees who responded to a second request for input in December, 2022, following the height of the COVID-19 pandemic.
Flores-Case 'Ohana		Secondly, some of the data in the "Translation" column are actually descriptions of these place names and not literal translations. Likewise, some of these descriptions are for place names on other islands or in other districts and they are not even relevant to the wahi pana of this area. The source of descriptions and translations in the tables are not identified, although they appear to be extracted from Place Names of Hawai'i. It is suggested that translations of these place names also be extracted from the various Hawaiian dictionaries as well as from other sources if available. Some of the translations appear misconstrued and their source unidentified.	Section 3.4.4.4 of the EIS and Sections 5.0 and 6.0 of the CIA have been revised to reflect additional information provided by interviewees who responded to a second request for input in December, 2022, following the height of the COVID-19 pandemic.
Flores-Case 'Ohana		The CIA can be greatly improved with the presentation of the maps in the figures. The resolution of some maps are so low that it's impossible to adequately review them (e.g. Figure 12). It's also suggested to not superimpose place names on older maps if they aren't actually on those maps. It makes it difficult to view these maps within their historical context (e.g. Figures 3 & 4). Also, some of the superimposed names are in the wrong locations. Names should only be superimposed on the map if it is difficult to read. If the CIA had a combined table/list of place names, then it could include one map locating all these place names by either a number or actual name. Likewise, unnamed pu'u and other geological features/cultural resources should also be identified on this map.	Your comment is noted.
Flores-Case 'Ohana		The CIA failed to include a listing of all known Hawaiian plants found in PTA. This plant list in Table 9 only includes endangered or threatened plants. Similarly, the plant list in the DEIS is also incomplete.	Your comment is noted. The purpose of a CIA is to assess potential impacts to cultural practices. Requirements are not prescriptive to the type and depth of resources described. Section 3.3 of the EIS analyzes impacts to biological resources, including native plants.
Flores-Case 'Ohana		The CIA failed to identify a number of pu'u within PTA. Only the pu'u identified on maps are referenced in this report. As a result, there were a number of pu'u without traditional Hawaiian names within PTA that weren't identified in the CIA. Also, the superimposing of pu'u and other place names on some of the historic maps when they aren't actually found on these maps distorts the historic record. (See Figure 3) Likewise, when some of these names were superimposed on these historic maps, they were positioned in the wrong locations. Based upon personal experience from site visits with PTA staff, E. Kalani Flores has noticed that some of these unidentified pu'u were used as landmarks that were in alignment with certain trails and habitation sites.	Updated figures have been included in the revised CIA.
Flores-Case 'Ohana		In addition, the CIA failed to identify other significant geographical features such as lava tubes, caves, and gulches, and some lava flows. The significance of these features are that they are referenced in early accounts, surveys, and travels through this area. Also, only two photos (cover photo and Figure 29) of the landscape are included in the CIA. Thus, the CIA lacks sufficient photos and information depicting the cultural landscape and significant features that are directly connected to Native Hawaiian cultural traditions and practices. Shown below is an example of the types of photos (depicting a cultural landscape in Kohala) with the pu'u names superimposed that should be included in the CIA.	Section 3.4.4.4 of the EIS and Sections 5.0 and 6.0 of the CIA have been revised to reflect additional information provided by interviewees who responded to a second request for input in December, 2022, following the height of the COVID-19 pandemic.

## Responses to Draft EIS Comments

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Flores-Case 'Ohana		<p>The CIA lacks an adequate discussion of wai (freshwater) elements and the connection to Native Hawaiian cultural practices, traditions, akua and kupua. Traditional mo'olelo and oli clearly identify Kāne, Waiau, Poliahu, Lilinoe, Līhau, Kahoupuokāne, and others associated with their kinolau and fresh water forms on Mauna a Wākea. Therefore, it's not surprising that the sacred springs on this mountain were called Lilinoe, Waihuakāne (Waihu), and Kahoupuokāne (spelling variations: Houpokane, Hopukani, Hapukani, etc.). Consequently, the use and diversion of water from these sacred springs by PTA and the State are considered forms of desecration in a cultural context especially when it's being used to flush toilets and other non-potable uses. There are cultural practitioners today that still collect this wai kapu from the source points where they first emerge from the ground for use in ceremonies. Inaccurate accounts are interspersed throughout the ALR and CIA.</p>	<p>Section 3.4.4.4 of the EIS and Sections 5.0 and 6.0 of the CIA have been revised to reflect additional information provided by interviewees who responded to a second request for input in December, 2022, following the height of the COVID-19 pandemic.</p>
Flores-Case 'Ohana		<p>The references to Ka'ohē Mauka and Pā'auhau Mauka/Makai as being ahupua'a is incorrect as substantiated by early Mahele records, survey accounts, and maps that reference these traditional ahupua'a without the terms "Mauka" or "Makai." Neither is this a "modern ahupua'a designation." Instead, the use of these terms misidentifies and misconstrues the actual names of these ahupua'a. The terms "Upper" and "Mauka" didn't appear on the maps until after 1900, not as the name of these ahupua'a, but instead were used as a reference to the inland portions of these ahupua'a. This is similar to how the directional terms of "uka" and "kai" were used when referencing different portions of an ahupua'a. However, the use of these terms did not change the actual original names of these ahupua'a.</p>	<p>Ahupua'a names referenced in the CIA and EIS are based on State GIS data, publicly available at <a href="https://geoportal.hawaii.gov/datasets/ahupuaa">https://geoportal.hawaii.gov/datasets/ahupuaa</a>.</p>
Flores-Case 'Ohana		<p>Some of the information pertaining to the Mahele in the ALR is inaccurate. The lands of Ka'ohē and Humu'ula were not "awarded" to Victoria Kamamalu. They were initially "claimed" on her behalf and then relinquished as part of her commutation. In addition, Ka'ohē was not "designated as Crown Lands" during the Mahele. After this ahupua'a was relinquished by Victoria Kamamalu, then it became Government Lands of the Hawaiian Kingdom. Likewise, Humu'ula was not "initially designated as Crown Lands" during the Mahele. Instead this ahupua'a was relinquished by Victoria Kamamalu and it then became Crown Lands after Kamehameha III retained it as part of his inventory of lands.</p>	<p>The ALR has been revised to include additional information.</p>
Flores-Case 'Ohana		<p>Information from the ethnographic study by Social Research Pacific, Inc., Final Draft Report: Planning Level Oral History Survey of Traditional Cultural Properties on U.S. Army Pohakuloa Training Area, Hawai'i Island, Hawai'i, (July 9, 2005) appears missing from the ALR and CIA. [See attached copy.]</p>	<p>Thank you for your comment.</p>
Flores-Case 'Ohana		<p>The CIA fails to clearly define "the Study Area." Throughout the CIA, there is an inconsistency of what area is being assessed with convoluted references to the "Region of Influence," "Project Area," "Geographic Extent," and "Study Area." Although the CIA states the following, the Study Area is depicted in Figure 5 as only the PTA area. The study area or geographic extent for traditional and customary practices can extend beyond the ROI utilized for tangible cultural resources. For the CIA, the geographic extent considered included the region between Mauna Kea, Mauna Loa, and Hualālai, known generally as the Saddle Region (Figure 5). Based on the collected ethnographic data, which largely focused on PTA, it was decided that the installation would make the most appropriate Study Area.</p>	<p>The CIA has been revised to clarify the Study Area.</p>
Flores-Case 'Ohana		<p>The ROI for the cultural resources assessment was limited to just the State-leased lands instead of the entire PTA area as noted below: The ROI for historic and archaeological resources includes the entire geographic extent of State-owned land within PTA. (DEIS p. 3-42). Even with this ROI being restricted to just the State-leased land, archaeological inventory surveys have not been completed for about 11,920 acres or 48% of these lands.</p>	<p>EIS Section 3.4.4.3 has been revised to describe why certain areas have not been surveyed. Figures have been refined to show where surveys have been completed and the general locations and types of sites within state-owned lands.</p>

## Responses to Draft EIS Comments

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Flores-Case 'Ohana		The ROI for the biological resources was also limited to just the State-leased and adjacent lands instead of the entire PTA area as noted below: The ROI for biological resources includes State-owned land leased by the Army and adjacent lands, both Government- and State-owned lands, where population distributions of plants or animals are contiguous. This ROI includes wildlife corridors and areas encompassing habitats that connect to the State-owned land at PTA, which potentially support protected populations. Even with this ROI being restricted to just the aforementioned areas, Figures 3-4 and 3-5 failed to accurately show "where population distributions of plants or animals are contiguous" to State-leased land. Also, these maps fail to accurately show the "wildlife corridors and areas encompassing habitats that connect" to the State-leased land.	The wildlife corridors discussion in Section 3.3 has been revised with the most updated available information.
Flores-Case 'Ohana		Native Hawaiian traditional and customary practices are directly tied to the biological resources. With the failure to complete a comprehensive review of the cumulative impacts pertaining to these biological resources, an analysis of the potential impacts upon Native Hawaiian practices cannot be adequately assessed. Conclusively, this DEIS doesn't include a comprehensive review of the cumulative impacts upon the cultural and biological resources within PTA.	Archaeological and cultural resources known within the State-owned land at PTA, and the Army's management program for these resources, are described in Section 3.4 of the EIS. This includes a discussion of traditional and customary practices as identified in the Cultural Impact Assessment, included as EIS Appendix I.
Flores-Case 'Ohana		It's contended that the Level of Significance being listed as "Less than significant" for Alternatives 1-3 is totally inaccurate. The DEIS doesn't include any cost estimates or analysis for the clean-up and removal of hazardous and toxic materials and waste, including unexploded ordnance and munitions debris/residues, from State-leased lands as it pertains to the various alternatives. The land contaminated with military munitions may potentially have soil, groundwater and surface water contamination from munitions residues (including explosives and heavy metals, chemical warfare agents or depleted uranium). These residues may derive from partially detonated and decomposing ordnance and explosives from training activities, flares, smoke grenades, open burning and open detonation disposal activities, munitions burial sites, weapons testing or other military activities. Also, the entire 2017 ECOP report should be included in the DEIS appendix or an online link to this report should be made accessible to the public in order to verify the analysis of this criteria.	<p>The economic costs to the Army under the various alternatives is beyond the scope of the EIS. The EIS analyzes the potential effects on the environment.</p> <p>The purpose of the Environmental Condition of Property report is to establish baseline environmental conditions at PTA, and the report was prepared to formulate an opinion of the environmental condition of the Subject Site (State-owned land leased by the Army). Due to the pre-decisional and deliberative nature and intent of the Environmental Condition of Property report, it is withheld from public distribution under Freedom of Information Act Exemption No. 5. To the extent feasible, the Army has made relevant resources available to the public. Additional Army documents are located at: <a href="https://home.army.mil/hawaii/index.php/ptaeis/public-info">https://home.army.mil/hawaii/index.php/ptaeis/public-info</a>.</p>
Flores-Case 'Ohana		There is no evidence that demonstrates a Section 106 consultation with NHOs has been conducted for this DEIS. Instead, the U.S. Army is attempting to apply a previously limited Section 106 process that was specific to only a 2018 PA that was primarily done for the development and operation of the Infantry Platoon Battle Course (IPBC) at PTA. It's also contended that the proposed undertaking for this DEIS falls outside of the scope of the afore-mentioned 2018 PA and as such would require a Section 106 process as stipulated in this PA:	EIS Section 3.4.2 documents that ongoing training activities at PTA have been taken into account through the Section 106 consultation process, and are documented in a 2018 programmatic agreement to resolve adverse effects.
Flores-Case 'Ohana		Furthermore, the U.S. Army was reminded about Section 106 requirements during the public scoping process of this DEIS as noted below. Yet, this Section 106 consultation was still not completed.	Section 3.4.2.1, ("Evaluation of Traditional and Cultural Properties Under NHPA") clarifies that this EIS complies with the requirements of NEPA and HEPA and does not address compliance requirements under NHPA or HRS Chapter 6E. NEPA has no requirement or procedure for conducting studies or assessments of historic properties significant for religious and cultural reasons.

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Flores-Case 'Ohana		<p>The DEIS is incomplete for failing to provide a complete analysis of several other potential alternatives by reducing it to just Alternatives 1-3. Likewise, training sites outside of Hawai'i are not identified as an alternative. In addition, there is no analysis for the use of blank and non-explosive munitions for military training. artillery, mortar, and rocket systems to mitigate the extremely adverse and destructive live-firing activities. Also, there is no disclosure as to what the U.S. Army intends to pay for the lease of State lands it plans to retain as part of the alternatives as well as how much it would cost to completely clean-up those lands not retained. The DEIS is incomplete for failing to identify the specific types of military activities that occur in each of the training areas in order for the public to make adequate comments in regards to potential adverse impacts associated with the alternatives.</p>	<p>Locations outside of the State-owned land at PTA and alternative training scenarios (e.g., computer-based simulation training) do not address the Proposed Action (retention of the State-owned land), do not meet the screening criteria, and were previously considered (see Section 1.1.3).</p> <p>Compensation for retention of the land would vary based on alternative and land retention estate selected and would be negotiated with the State after the NEPA/HEPA process; therefore, it is not possible to discuss potential compensation in the EIS. Likewise, costs to investigate, remove, and clean up hazardous substances and hazardous wastes and conduct various other lease compliance actions would depend on the alternative selected and negotiation with the State after the NEPA/HEPA process; therefore, it is not possible to discuss these potential costs in the EIS.</p> <p>Table 2-1 describes the training facilities and associated actions within the State-owned land, and Figure 2-1 illustrates the locations of those training facilities as well as the Training Area boundaries. Section 2.1.2 summarizes the types of training conducted in the State-owned land.</p>
Flores-Case 'Ohana		<p>The DEIS Section 3.3 Biological Resources is incomplete as it fails to include a listing of all known Hawaiian plants in addition to those listed in Table 3-3.</p>	<p>Native species are discussed in Section 3.3.4, impacts to protected and native species are discussed in Section 3.3.6. Text within these sections has been revised and expanded to include natural resource management measures that the Army is implementing that benefit the land and protected species.</p>
Flores-Case 'Ohana		<p>Section 3.6 Air Quality and Greenhouse Gases is incomplete for failing to provide a detailed description of the type of fugitive dust that has been generated by ongoing live-fire exercises, troop training, and wind erosion. There have been times when travel on Saddle Road has been curtailed during dust storms generated from the PTA area.</p>	<p>Section 3.6.4 revised with the sources of fugitive dust.</p> <p>Sections 3.6.4 and 3.6.6 revised to state PTA manages and would continue to manage fugitive dust via 1) erosion control and stabilization techniques (revegetation, erosion control structures, site hardening, dust palliatives) under the Land Rehabilitation and Maintenance component of the Integrated Training Management Program (USAG-HI &amp; USARPAC, 2013), 2) adherence to Unified Facilities Criteria 3-250-09FA, Aggregate Surfaced Roads and Airfields Areas, which has dust control requirements for aggregate surfaced roads and airstrips of airfields at Army installations, and 3) best management practices such as maintenance of roads and training trails, maintenance of vegetative cover, periodic application of water to control dust, and modifying training during high risk conditions. Integrated Training Management Program Land Rehabilitation and Maintenance project best management practices are assessed annually during Range and Training Land Assessment reviews (U.S. Army Hawaii Range Division, 2022).</p>

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Flores-Case 'Ohana		<p>The DEIS Section 3.7 Noise is inaccurate and incomplete because it is apparent that the noise analysis of troop training is based primarily on modeling instead of actual monitoring. Case in point, we have experienced hearing live-firing outside of the PTA boundaries in cultural and recreational areas such as the Gilbert Kahele (Mauna Kea) Recreational Area, summits of Mauna Kea and Mauna Loa, and surrounding areas both during daylight and evening hours. In addition, artillery live-firing can be heard and felt in residential areas from adjacent Waiki'i and Humu'ula – Department of Hawaiian Home Lands and as far away as Waimea and other residential areas. The noise impact upon Kanaka Maoli cultural practitioners during ceremonies and activities occurring within and outside of PTA is not addressed. Alternatives 1-3 should be considered a "Significant impact" especially with the concentration of training areas, firing-points, and the airfield within or adjacent to the State-leased land.</p>	<p>DoD evaluates noise in terms of the Hawai'i State Department of Health "Hawai'i Maximum Permissible Sound Levels", DoD's Installation Compatible Use Zone and Hawai'i Statewide Operational Noise Management Plans, as well as Army Regulations that categorize noise exposures. Noise modeling is a scientifically proven method of assessing noise impacts. A noise modeling study was done in 2020 that considered noise zones for military munitions using a baseline model (EIS Figure 3-8), a neutral weather model (EIS Figure 3-9), and a model for weather conditions that enhance sound propagation (EIS Figure 3-10). Analysis of the models indicate that less than significant (LUPZ) and generally not compatible (Zone II) noise levels extend slightly beyond the PTA boundary; however, the overlaps occur over uninhabited forest reserve areas and no noise-sensitive lands are impacted. It is understood that noise will be heard beyond the model contours, particularly during inclement weather as discussed in Section 3.7.4; however, any noise that reaches noise-sensitive lands would be less than significant.</p> <p>The EIS text has been revised to include the Army's public notification process. This additional text includes that the Army issues a monthly training advisory to the public informing the local community, stakeholders, and elected officials of upcoming training that may be louder and noticeable. Additionally for stand-alone large scale joint or Army exercises a separate advisory to put a spotlight on the increased level of training and increase the public's general awareness is issued 24 hours prior to training activities. These advisories provided via email news, radio, newspapers, various boards (e.g. neighborhood boards, Native Hawaiian Advisory Council) and are sent to people who have requested to be added to the Training Advisory subscription list.</p> <p>Please see Section 3.7 for additional information on noise and noise analysis.</p>
Flores-Case 'Ohana		<p>The DEIS Section 3.8 Geology, Topography and Soils is incomplete for not including a geological survey of the unique lava flows, substrate, configurations, and lava tubes within PTA and the State-leased lands. Also, the extent of permanent and irreversible impact upon this landscape as the result of site clearing, grading, ground softening, roads/trails, and quarrying has not been disclosed.</p>	<p>Section 3.8.4.2 discusses lava flows and quarries within the State-owned land; these features are shown in Figures 3-12 and 3-13.</p> <p>Section 3.8 of the EIS notes that the U.S. Fish and Wildlife Service recommends rock from onsite location be used to minimize inadvertent transport of invasive plant species. Section 3.2 describes that the lease permits the Army to use rock and similar materials from the premises for construction on site.</p> <p>Impacts from maneuver training activities are monitored and managed through implementation of the ITAM program, which utilizes Best Management Plans to reduce erosion and runoff. These practices have been added to the EIS.</p>
Flores-Case 'Ohana		<p>The DEIS Section 3.9 Water Resources is incomplete and inconclusive as there is insufficient studies and data to support any type of analysis of the impact and level of significance upon the groundwater. Likewise, the amount of hazardous and toxic materials and waste, including nonpoint source pollutants such as contamination from military munitions use during training activities, that has the potential to leach into the groundwater due to the fracturing of the earth surface due to the constant bombardment within the Impact Area is unknown. Any analysis must consider the Impact Area since the firing-points are located on the State-leased land. Also, the DEIS lacks an analysis of the impact and level of significance upon the use and diversion of water from the sacred springs of Kahoukōkō, Waihūakāne, and Lilinoe on Mauna a Wākea, also considered significant cultural resources.</p>	<p>Groundwater and surface water quality are discussed in Section 3.9 of the EIS. The Mink &amp; Lau 1993 reports serve as the framework for a groundwater protection strategy, utilized by the State, that classifies and assigns codes to the principal aquifers. The State Department of Health (DOH) Safe Drinking Water Branch (SDWB) monitors groundwater quality of aquifers as described in EIS Section 3.9. SDWB has released groundwater contamination maps for Hawai'i Island that show most contamination is along the eastern coast of the island. You can learn more directly from the source cited in this section, the DOH SDWB Environmental Health Portal at <a href="https://eha-cloud.doh.hawaii.gov/sdwb/#1/home">https://eha-cloud.doh.hawaii.gov/sdwb/#1/home</a>.</p> <p>Section 3.9.4.3 of the EIS estimates the Army uses approximately 1,500,000 gallons of water from the closest spring (approximately 4,100 gallons per day) for non-potable purposes. Water use is authorized under a separate water lease from the State.</p>
Flores-Case 'Ohana		<p>The reference in the DEIS pertaining to the Republic of Hawai'i assuming ownership of the Crown and Government lands of the Hawaiian Kingdom is inaccurate. These were clearly "stolen lands." Likewise, the Republic of Hawai'i was never legally annexed to the United States as a treaty of annexation was never executed and approved with a two-thirds vote of the U.S. Senate in 1898 due to Kanaka Maoli resistance at the time. What occurred in 1898 was just an illusion to secure and occupy Hawai'i due to its strategic military location in the middle of the Pacific.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

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Flores-Case 'Ohana		There are several individuals named Kalani Flores. If the one listed in Table 1 of the CIA is referring to E. Kalani Flores of the Flores-Case 'Ohana, he isn't associated with the University of Hawai'i at Hilo.	Thank you for your comment. Kalani Flores' association has been verified.
Flores-Case 'Ohana		Firstly, the proposed continued military operations at PTA are not an allowable use for this conservation district per HRS Chapter 183C and HAR Chapter 13-5. Also, military use is not in alignment with the purpose of land use in a conservation district as noted below. §183C-1 Findings and purpose. The legislature finds that lands within the state land use conservation district contain important natural resources essential to the preservation of the State's fragile natural ecosystems and the sustainability of the State's water supply. It is therefore, the intent of the legislature to conserve, protect, and preserve the important natural resources of the State through appropriate management and use to promote their long-term sustainability and the public health, safety and welfare.	Section 3.2.4 of the EIS describes that military activities on State-owned land were authorized by the 1964 lease. The Conservation District rules were enacted following the lease, and consider uses prior to October 1, 1964 as nonconforming, as described in HRS §183C-5. The 1964 lease has been included as Appendix F. The EIS has been refined to describe the administrative processes to use of the State-owned land following additional discussion with OCCL.  Sections 3.3 and 3.4 of the EIS have been revised to include standard operating procedures (SOPs) and best management practices (BMPs) to minimize impacts to natural and cultural resources.
Flores-Case 'Ohana		the proposed Alternatives 1-3, especially with the military activities, firing-points, training areas, and live-fire operations within the State-leased lands, would continue to cause a severe disturbance, destruction, and desecration to the land and everything and everyone connected to it at various levels and dimensions. The analysis pertaining to environmental impacts is considered extremely inaccurate especially when the level of significance for almost all resources is listed as "less than significant" in this DEIS. This analysis is inconsistent with the environmental impacts identified in other EIS for military uses within PTA such as the Record of Decision: Military Training Activities at Mākuā Military Reservation, Hawai'i (see Tables 5 & 6). Particularly, the impacts to biological and cultural resources of military activities at PTA were identified as being a "significant impact." So how can impacts of these military activities that are occurring in the State-leased lands as shown in the photos below be considered less than significant in this DEIS? ?	The Proposed Action, alternatives, and existing conditions at Makua Military Reservation are different from those at PTA; hence, the potential impacts are different. The potential impacts from continuation of actions in the photographs provided are analyzed in the EIS.
Cindy Freitas		Aloha. I am Cindy Freitas. C-I-N-D-Y, Freitas, F-R-E-I-T-A-S. I'm a culture practitioner from a long line of practitioners. Prior to 1776. The EIS is unacceptable to me for one reason -- for many reasons. I know SHPD had recorded a lot of stuff up there. 1998, the 12 [inaudible] up there. 1986, the habitation of the cave up there. 2015, the carrying stick, which I think is something else that I saw. The cordage of the kaula, which is the coconut fibers and husk. But I think you left out the bones. Our ancestors were smart people who cultivate the land, who grow food to provide for their people. And one thing about the kumulipo, they buried themselves on the land. So there is a lot of missing things in here. I see some. But the main important stuff is the iwi, which I know it's up there. And that's why I'm here today, because they call upon me to come and talk. There is a lot of missing pieces up there, and that's why I feel the EIS is unacceptable. In all due respect to the PTA, I honor you guys in what you do to protect and serve, but I don't think you are serving for the people, especially those of my ancestors who was there way before my time, way before your time, who have done what they had to do. I can say in the provision of 711-1107 HRS of desecration of a sacred place, a burial place, that is what that rule is. HRS 711-1107 is what you are missing in your EIS. Desecration of our land. So in all due respect to you guys, and mahalo for this opportunity, mahalo.	The EIS was prepared within the statutory regulations provided under NEPA and HEPA. The Army will be responsible for compliance with NHPA and HRS Chapter 6E. Any questions regarding the applicability of HRS 711-1107 should be raised during the HRS 6E compliance process.
Ella Friedman		Pōhakuloa is not a place for military training. It has adverse impacts on Hawaiian cultural practices, natural resources, wildlife, and more. The land needs to be preserved, not taken from the people who care for it most. Land and nature has a connection to Hawaiians that many fail to understand. The land is sacred and revered, that belief has been there since the Ancient Hawaiians. Your desecration of Hawai'i must stop.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Mackenzie Fugett		No need. It is harmful to our native plants, birds and people whose ancestors are burried.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Keala Fung		I do not support any military training in The Pohakuloa area, The military needs To permanently and completely vacate the area as well as remove any trace of its existence in that area, and restore the space to its natural state before the military occupied that area.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Len Gambla		<p>Thank you for soliciting comments. The document is quite extensive and almost thorough. My comments are less on the merits of the EIS and more on the assumptions that feed into the narrative.</p> <p>I would like to comment on items that are not in the document rather than address what is in the document. I believe having all of the information and understanding the assumptions is more important than discussing the merit of the information within. You are setting the conditions with a pre-determined outcome and while I can appreciate such an effort, let's look outside the Army box for a minute.</p> <p>First, three alternatives are mentioned with a fourth as an afterthought... "The Army developed three action alternatives for the Proposed Action..." However, what is missing are alternatives numbered five and greater outside of Hawaii. Clearly those must be under deliberation by the U.S. Army and while not specifically part of this exercise, could have been noted. Otherwise, under-informed individuals might not be aware that further alternatives exist.</p> <p>Second, perhaps it's the assumption of the 'mission' that needs to be examined. Again, while not the focus of this document, it underpins the planning and the rationale for the three action alternatives. I would assert that refocusing the mission would be a better focus of efforts. I would love to see the Army's assessment of the chances that the U.S. will be invaded in a land war. I would assert it's very low.</p> <p>Thus, the 'mission' as implied is to help our allies who might get invaded. This goes back to my point about redefining our mission. In short, I would say we focus less on being the world's policeman and more on working with other countries. Look for other less offensive 'action alternatives'.</p>	<p>The Army established screening criteria to identify the range of potential alternatives that support the purpose of and need for the Proposed Action in Section 2.1.4 of the EIS.</p> <p>Locations outside of the State-owned land at PTA do not address the Proposed Action (retention of the State-owned land), do not meet the screening criteria, and were previously considered (see Section 1.1.3).</p>
Len Gambla		<p>Without going into a long diatribe, I wholly support ES.8.4 No Action Alternative. The U.S. Army has considerable resources and I am sure with enough effort, a suitable non-Hawaii based alternative can be found -- especially if the underlying 'mission' is reconsidered as we reduce our policeman role around the world. I understand this might be hard to understand. If your going in philosophy is centered around 'war' it will be hard to understand what I'm saying. However, if your view is not on a mission that focuses on 'war', then the chances are you will be better to see alternatives.</p> <p>Conversely, if my view was only on 'peace' I might not see your point of view. What I am saying is that there is a middle ground.</p> <p>Set the conditions for this middle ground concept. Then put your considerable resources together and try to see what I am referencing here and provide action alternatives in this vein.</p>	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Mary Garcia		<p>The sacred islands of Hawaii have been littered and destroyed for far too long. Why is the military using these lands to train anyway? There's plenty of other sacred lands on the mainland they could choose from. Oh wait, they already did that. So, not only are we taking the ancestral homes from the indigenous peoples of what we call "America" but we're also blowing some of their most sacred sites to smithereens and rendering the earth as good as poison. The selfish greediness of the government would rather destroy the Earth and have a battle of ego by showing larger guns, as opposed to cultivating the land from coast to coast in order to create prosperity and nourishment for its people to thrive and create a better future? Why should we give them permission to play with their deadly toys on the aina that cares for so many? Why should we give them permission to do that to any of the lands that they have stolen from their rightful stewards? Besides, if this lease were to expire without renewal, would they even leave? Would they return the land? Sounds almost impossible. Still, what if we didn't renew it. I think that's a solid idea to take a step in the right direction, to return this land to its rightful guardians.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Cassandra Giarrusso		<p>Hello, my name is Cassandra Giarrusso, and put quite simply, we need to return as much land to Native Hawaiians as humanly possible, because we as a country, the U.S. government, took this land from Native Hawaiians without asking 70 years ago, and we haven't done anything to help them to give it back to them since, and if we can -- even if a little bit helps. So thank you. Have a nice day. Bye.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Michelle Glowa		<p>As the daughter of two parents who grew up in military families living for periods of time on the Hawaiian islands, I feel particularly aware of the grave impact militarism has had on the land, culture, and people of Hawai'i. The Pōhakuoloa Training Area covers a vast and incredibly culturally important area of land between Mauna Kea and Mauna Loa. As the largest contiguous live-fire range and maneuver training area in Hawai'i, I believe the permit should be denied, which would only reduce the PTA's size by less than 1/6th. The Army has been responsible for damaging sensitive native ecosystems, leaving unexploded ordnance, depleted uranium, and other contaminants, and causing harm to Native Hawaiian cultural sites. In 2018 the State Circuit Court ruled in Ching v. Case that the DLNR failed to care for the PTA forsaking inspections over the first nearly 50 years of the lease. Judge Chang upheld Hawaiian land ethics ruling that the state has a duty to "mālama 'āina". The Judge called two DLNR inspection reports "grossly inadequate". It is now the state's responsibility to clean up the land. This does not include extending the permit to the polluter to continue this gross negligence and disrespect for the land. This land should be returned to Native Hawaiians and protected from continued degradation. The DEIR correctly states that even with mitigation "the cumulative impacts on cultural resources has been, and will continue to be, significant". To have a munitions and military training base over archaeological and spiritual sites is antithetical to respecting the sacredness of the land.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Bridget Goerke		<p>I stand with and support the Native Hawaiians who disagree with how their sacred land is being used for military training. It is their right to the land and the land should be treated properly. Please stop all military trainings at PTA.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Randy Goff		<p>Oppose. We must protect our natural resources and native indigenous plants and animals that are under attack all over the world. Help us save what is left - give the land back to the people of Hawaii for protection of this beautiful state</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Lou Gold		<p>I am very concerned that the EIS be conducted on all the relevant issues and resident concerns. Please give full consideration to the concerns detailed in the PDF files of the technical comments submitted by Cory Harden and the Sierra Club, which I am uploading with this submission. Thank you in advance for treating these concerns with utmost attention and seriousness. Sincerely, Lou Gold</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Maria Gomez		<p>To choose to go forth with the military action of the United States in Pōhakauloa is to paint the military, and all its members, as pure and blatant Terrorists. The nation is at a turning point right now, when young people all over are growing up, learning, watching. They will not turn a blind eye to the crimes you commit. Remember that as you go forward.</p> <p>To continue the usage of any part of Hawaii for military exercises is to desecrate the honor and thousand-year history of its people. Dishonor and brutality of the destruction of sacred land is something that no person can truly come back from. If you, who hears this, is a person of religion or spirit, I must ask, will you be forgiven? What use does your God have in the cruelty of the terrible and violent rape of these sacred lands? These are the acts of a devil, plain and pure. And if you are not a person of religion or spirit, will you live freely? Will the shame of these heinous acts not crawl at you in your last moments? Will you be able to truly forget the words I write here, forewarning you of the indignation, the shame, you will feel at the savage actions you may yet commit?</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Maria Gomez		<p>The tremendous environmental impact is felt not by you, nor your peers, but by the people of Hawaii. Would you want your home destroyed? Would you leave your people without even a land to live on? Would you rip and tear at the earth of your home, careless of the needs of your children to live, all for some foolish military exercise? What, I ask, is the merit in continuing the fraught legacy of those who bombed Kaho'olawe? The military's actions there were horrific. The restoration will take generations and will yet never truly replicate the glory of that proud place. We call the men who took that land from us scum now. What do you stand for that is more important than the history, culture, livelihood, and love of the Kānaka Maoli, the People of Hawaii? What will your children remember you for? What are you saying, not just to the People of Hawaii, but to all the people of the United States, when your bombs are shattering the fragile stone that Hawaiians have walked on for centuries, or when they pollute the water that children have laughed and played in for a thousand years? That nothing is off limits to the military? That you are to be feared and hated? Your bombs will destroy not just the legacy of Hawaii, but your own as well.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Mark Gordon		<p>Just wanted to share some comments for the need for allowing the military to continue training at US Army Garrison, Pohakuloa (PTA), Hawaii Island:</p> <p>PTA is the only training area in the Pacific region where the Marines and Army can complete all mission essential tasks. Although the military does train on installations on Oahu and some other Islands, the only installation in Hawaii that can accommodate larger than company-sized units (i.e., battalion and brigade) for live-fire and maneuver exercises is PTA. This type of large-scale training ultimately prevents injuries and saves soldiers' lives when they are deployed to the battlefield. ·</p> <p>The importance of the military on Hawaii Islands is clearly demonstrated when RIMPAC, the Rim of the Pacific Exercise, the world's largest international maritime warfare exercise chose the Hawaiian Islands as the site for the every 2 year exercises. ·</p> <p>PTA is critical to ensure that our military is trained prior to deployment to other areas worldwide ·</p> <p>PTA has also been used in military training exercises with other ally countries ·</p> <p>PTA is the only such military training area in the Pacific Region ·</p> <p>As a regular volunteer of the USO-PTA, I many times visit with the soldiers. They are a very committed group and appreciate the area on the Big Island to train prior to deployment. In addition, they respect the land, people and the environment. ·</p> <p>PTA is geographically in the center of Hawaii Island with little negative effect on the public, other than convoys. However, convoy times on public roads are coordinated to reduce, as much as possible negative effects on traffic In addition, PTA PIO announces in advance what dates and projected times, as well as the roadways the convoys will be travelling.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Mark Gordon		<p>Having lived in Waikoloa Village on Hawaii Island for over 6 years, we have noticed none or very minor noise issues when soldiers are training the area ·</p> <p>Military aircraft avoids as much as possible flying over residential areas ·</p> <p>During military deployment to PTA, soldiers have assisted the community in helping build a new park in Kamuela; helped with food drives, etc. ·</p> <p>As a safety engineer and working on PTA as a USO volunteer, I feel that training exercises are done in areas that are not harmful to humans, plants or animals. In addition, training is done in areas of the facility with very low probability of fires occurring. The military work jointly during training exercises with the onsite PTA Fire Department.</p> <p>Staff from PTA has been helpful in emergency rescues around Saddle Road and other areas ·</p> <p>Waikoloa Village had the great assistance of PTA requesting and obtaining Federal fire fighting aircraft and other equipment in the recent wildfire which almost approached Waikoloa Village properties, homes and other areas. PTA played a Major role in containing the fire from entering the Village, with no loss of homes and no public harm.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Mark Gordon		<p>As Chair of the Waikoloa Village Firewise Committee, we have had many public information forums where the Lt Colonel of PTA, the PTA Fire Chief, along with HFD and other agencies have actively participated.</p> <p>Thank you for allowing me to share my comments and observations of why continuing the lease with PTA is necessary Mark Gordon, Waikoloa HI.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Jody Green		<p>Aloha and thank you for the opportunity to comment on the use of Pohakuloa Training Area by the military. The only reasonable option is The No Action Alternative (no retention of State-owned land after lease expiration). Hawaii has been used by the military for too long and our environment has suffered dangerous impacts as a result of it. Now is the time to cut back the use of our precious lands by the major polluters who have flagrantly disregarded the health of Hawaii's population, and the sacredness of lands to the Hawaiian people. The military needs to clean up Pohakuloa and stop destroying our a'ina. The damage the military is creating is unacceptable, and needs to stop immediately before more of our lands are permanently damaged. The ones who have to pay for clean up of the water and the damaged lands always falls on the taxpayers. This is wasteful and makes the price of using our state for practicing war games far too costly. Stop the use of Hawaii's precious and sacred spaces by the military, clean up the a'ina and return the land back to Hawaii. Mahalo.</p>	<p>Thank you for sharing your concerns. The Army understands its responsibilities for proper stewardship of the land and has the utmost respect for Native Hawaiians. In accordance with the lease, and under the provisions of existing law, the Army retains responsibility for cleanup and restoration of former training areas. After the lease expires, the Army will follow Army regulations to determine how and when the cleanup and restoration will occur, following the CERCLA process.</p>
Patricia Greene		<p>Aloha and I am one of the 38 Kupuna that were Arrested on MAUNAKEA on Wednesday July 17th, 2019.  My Father ( Robert Joe Albert) was 17 and in the ARMY Stationed at Schofield, Pohakuloa, and Punalu'u (Green Valley). From Pearl Harbor Attack.  I am 71 and ENOUGH IS ENOUGH STOP THE DESTRUCTION OF OUR NATIVE LANDS WE CONTROLLED FOR 1,000 YEARS.  STOP POISONING OUR AQUIFER NOW ! My Father Warned me of RED HILL years ago.  STOP TEARING OUR LANDS INTO SHREDS BY HIGHLY TOXIC CHEMICALS. The Disrespect must CEASE NOW !!!  GO SOMEWHERE ELSE AND TEAR UP THEIR LANDS &amp; SEE THAT IT IS NOT TOLERATED.  HAWAIIANS HAVE NOTHING HAWAIIANS HAVE NOTHING HAWAIIANS HAVE NOTHING  OUR HOMELANDS, ILLEGALLY S T O L E N BY AMERICA. We Were an INDEPENDENTLY RECOGNIZED NATION BY OVER 60 OTHER NATIONS !  WE WERE 800,000 PEOPLES IN 1800.  THE ILLEGAL OCCUPATION BY AMERICA STARTED THE GENOCIDE OF THE HAWAIIAN NATION AND NOW A MERE 30,000 of US ARE LEFT. The GENOCIDE DID WHAT THEY WANTED AND REDUCED US TO ALMOST NOTHING AND EVERYONE OF US ARE POOR or BARELY ABLE TO SURVIVE SINCE THIS IS A DESTINATION FOR ONLY THE ARMY, THE TOURISTS AND HUNDREDS OF MILLIONAIRE INVESTORS.  We Get N O T H I N G.  My GRANDMOTHER BORN 1908 Was a Large Landholder due to Her FAMILY'S POSITION &amp; AMERICA STOLE ALL OF IT BECAUSE THEY COULD SHE WAS ONLY A CHILD</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Robert Gregory		<p>Dear Gentle people Aloha - and thank you for the opportunity to address serious issues. Seems to me, as a visitor to Hawai'i in the past and hopefully in the future, the dangers of the residue of military activities on Big Island are many. Not only lead and maybe PFAS and unknown toxic substances, but radiation from the use of depleted uranium constitute a clear and present danger to the visitors, and certainly to those who reside on Big Island. Winds and water have a way of moving particles, especially radioactive particles, far from where they lodge after military exercises. Such particles tend to drift down, and then given bio-accumulation, will increase in intensity and risk. Visitors such as me in the past, are not warned of the risks and dangers of such radioactivity. At the least, given that any real cleanup is likely impossible at this time, the visitors and the local people should be given full and accurate information about the dangers, risks, and possible cancers or other illnesses that may result. I for one would like to see a plan for clean-up, both now and in the long term, including cost benefit analyses for the life of the people and their descendents resident on the island. Studies of the damage to plants and animals, and the sea creatures, would and should be mandatory. It seems a waste to defend an island by destroying it and the life that was doing so well in history. Sincerely and mahalo, bob g -- "Each time a man stands up for an ideal, or acts to improve the lot of others, or strikes out against injustice, he sends forth a tiny ripple of hope, and crossing each other from a million different centers of energy and daring, those ripples build a current which can sweep down the mightiest walls of oppression and resistance." Robert F. Kennedy Capetown, June 6th 1966 Pacific still means peace, bob gregory</p>	<p>Section 3.5.4.12 includes references noting that the depleted uranium did not aerosolize upon impact and per DODD 4715.11 high explosive munitions are not permitted to be fired into the same area as the depleted uranium impact locations. Section 3.5.4.12 notes that the Army completed a 1-year airborne uranium monitoring program in 2009 to determine if depleted uranium has impacted local air quality. Total airborne uranium levels collected from 210 air samples at PTA were within the range of naturally occurring uranium in Hawaiian soils and rock and were several orders of magnitude below the U.S. and international chemical and radiological health guidelines; therefore, the depleted uranium has not impacted local air quality. Section 3.6.4 discusses fugitive dust monitoring for depleted uranium at PTA, which concluded that the depleted uranium has not impacted air quality at PTA or in the surrounding areas.</p> <p>Sections 3.6.4 and 3.6.6 revised to state PTA manages and would continue to manage fugitive dust via 1) erosion control and stabilization techniques (revegetation, erosion control structures, site hardening, dust palliatives) under the Land Rehabilitation and Maintenance component of the Integrated Training Management Program (USAG-HI &amp; USARPAC, 2013), 2) adherence to Unified Facilities Criteria 3-250-09FA, Aggregate Surfaced Roads and Airfields Areas, which has dust control requirements for aggregate surfaced roads and airstrips of airfields at Army installations, and 3) best management practices such as maintenance of roads and training trails, maintenance of vegetative cover, periodic application of water to control dust, and modifying training during high risk conditions. Integrated Training Management Program Land Rehabilitation and Maintenance project best management practices are assessed annually during Range and Training Land Assessment reviews (U.S. Army Hawaii Range Division, 2022).</p> <p>In accordance with the lease and under the provisions of existing law, the Army retains responsibility for cleanup and restoration of former training areas. After the lease expires, if deemed necessary, the Army would follow Army regulations to determine how and when the cleanup and restoration of State-owned land not retained would occur under the CERCLA process, which is outside this EIS process.</p> <p>PTA only uses Aqueous Film Forming Foam containing PFAS for structural and aircraft fires. There is no known PFAS release within the State-owned land.</p>
Michael Guritz		<p>The low rate at which we are being compensated for this land is repulsive. Going rate for this land should be in the millions of dollars a year and I believe that Big Island county deserves millions to fix the damage of years of bombing, damaged roads from the giant convoys and environmental damage. If we can spend millions for bases in Kuwait and Germany, our citizens out towns out people deserve the same.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Cory Harden		<p>The military needs to seriously consider moving training from PTA to a less sensitive area. PTA hosts 50 at-risk species and has tremendous cultural significance.</p> <p>The military already operates on thousands of acres of land, and hundreds of square miles of ocean and airspace around Hawaii. Regardless, they have plans to greatly expand PTA and other operations. They can't manage without PTA. But they said the same about Kahoolawe and Kapukaki (Red Hill). They also say they can't manage without State land, since it hosts vital facilities for electricity, drinking water, communications, and roads. But they built all that knowing the lease would expire in 2029.</p> <p>The military has not lived up to its lease obligations on State land. They failed to cleanup unexploded ordinance, junk cars, and old tank, shell casings, white phosphorous, and rubbish. There have been three fires in the past seven years. Only about half of the needed archaeological surveys have been traditional cultural property at PTA.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Cory Harden		<p>They have also been negligent elsewhere. At Waikoloa, unexploded ordinance has not been cleared for decades. On Kahoolawe, one out of every four surface acres has not been cleared of unexploded ordinance. At Kapukaki, the military claims the water is now safe, but people returning to their homes report continued problems.</p> <p>The military complains that Congress does not give them money for cleanup, or protection of environmental and cultural resources. But do they lobby as hard for that as they do for new land and new weapons? Congress and many business people see the military as good for the economy. But the water contamination at Kapukaki means Oahu may have to ration water, and some new construction may need to be put on hold. And the cost of eventual cleanup for military toxins and unexploded ordinance statewide is astronomical. Despite all these concerns, the military hesitated to allow public testimony at this meeting, and says it will not consider "non-substantive" comments such as general objections to the military. But if scores of people say they've had enough, it's time to listen.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Cory Harden		<p>2. What approvals will be needed from DHHL?                      "At this time, the U.S. Government's best information as to ownership of the TMK parcels comprising the State-owned land is as follows, from west to east: TMKs (3) 7-1- 004:007, (3) 4-4-015:008, and (3) 4-4-016:005 are owned by the State; the two easternmost TMKs, (3) 3- 8-001:013 and (3) 3-8-001:022, are owned by the State and managed and administered by the Department of Hawaiian Home Lands (DHHL) (Figure 3-1). These two easternmost parcels are referred to as "DHHL-administered" in this EIS. The TMKs do not correlate with the boundaries of the TAs or Parcels A, B, and C. A boundary survey is currently underway for State-owned land at PTA to validate the precise boundaries, including the DHHL-administered land."</p>	<p>As recommended in DHHL comments, the EIS has been revised to remove the 250 acres of DHHL-administered land from Alternative 1. Consequently, the 250 acres of DHHL-administered land are no longer considered for retention by the Army in any alternative.</p>
Cory Harden		<p>5. Describe the progress and plans for providing potable water from a well. ?6. Since groundwater does not recharge, how long would such a well be useful? "The old age of the "fossil" high-level groundwater encountered at PTA and to the northwest at Waiki'i Ranch support the hypothesis that minimal direct recharge occurs to these aquifers from infiltration of rainfall that falls on these lands"</p>	<p>Groundwater extraction from State-owned land at PTA is not proposed or foreseen as part of the Proposed Action.</p>
Cory Harden		<p>7. Where is the land eyed for "East Land Acquisition"? Describe progress on this. Past, Present,...actions</p>	<p>Please review the PTA Final Real Property Master Plan cited in the EIS as the information source. Chapter 6 (References) provides the full document citation and includes an electronic link to those documents available on-line. To the extent feasible, the Army has made relevant resources available to the public. Additional Army documents are located at: <a href="https://home.army.mil/hawaii/index.php/ptaais/public-info">https://home.army.mil/hawaii/index.php/ptaais/public-info</a>.</p>
Cory Harden		<p>8. People in Hamakua report hearing explosions that also rattle their windows. Noisy jets and helicopters sometimes fly over Hilo. What is being done to reduce noise?                      9. A resident reported he was almost blown off his motorcycle on Saddle Road by the concussion from weapons firing. What is being done to eliminate such hazards?</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Cory Harden		<p>What cleanup has been done on State land since the court decision?                      Will State land be completely cleaned up before the lease expires?                      10. Is it correct that waste from cleanup after biological and chemical tests at Waiakea were put into the PTA dump years ago?</p>	<p>The current status of management and cleanup of hazardous substances and hazardous wastes is discussed in Section 3.5.</p> <p>In accordance with the lease and under the provisions of existing law, the Army retains responsibility for cleanup and restoration of former training areas. After the lease expires, if deemed necessary, the Army would follow Army regulations to determine how and when the cleanup and restoration of State-owned land not retained would occur, following the CERCLA process.</p> <p>The Army has no record of any cleanup related to the sarin tests conducted in Waiakea in April-May 1967 and there is no record of any associated materials being moved to PTA. The Army has no records or evidence to suggest that biological or chemical wastes were disposed of at either of the two landfills at PTA. The landfills are categorized as municipal landfills, which do not contain hazardous wastes.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Cory Harden		<p>11. What would justify nonconforming use for military operations in the conservation district??                      "The region including and surrounding PTA was included in the conservation district. The lease for Army use of State-owned land was signed in August 1964, prior to the enactment of HRS Chapter 183C. Per the statute and its enacting rule, HAR Chapter 13-5, Conservation District, lawful use of land prior to October 1, 1964, is considered nonconforming Military use is not included as an allowable use for any conservation district subzone. HAR Chapter 13-5 provides for authorization of additional uses through discretionary permits from the State Board of Land and Natural Resources (BLNR). Any request for a permit would follow the EIS process and determination of the land retention estate(s) and method(s)"                      " All of PTA was classified as conservation district under the State's 1961 Land Use Law. Hawai'i conservation district statute and rules, HRS Chapter 183C and HAR Chapter 13-5, were enacted in 1964. Lawful use of land, established prior to October 1, 1964, is considered nonconforming. The statute and rule define nonconforming as "the lawful use of any building, premises or land for any . . . purposes which is the same as and no greater than that established prior to October 1, 1964 . . ."                      The lease for military use of the approximately 23,000 acres at PTA was signed on August 16, 1964, and is considered nonconforming per HRS Chapter 183C and HAR Chapter 13-5. Military use is not defined as an allowable use for any conservation district subzone, but HAR Chapter 13-5 provides for authorization of additional uses and, therefore, allows for conformance with the rules."</p>	<p>EIS Section 1.4.2 has been refined to describe the administrative processes to use of the State-owned land following additional discussion with OCCL.</p>
Cory Harden		12. Could PTA be closed by a presidential executive order?	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Cory Harden		13. Describe how training would be accomplished if PTA is closed.	The No Action Alternative is discussed in Section 2.2.4.
Cory Harden		What is the Army's preferred option for retaining the state land? And the likely option?	The Army's preferred alternative has been added to Section 2.4.
Cory Harden		<p>Cory Harden. C-O-R-Y and H-A-R-D-E-N. The military needs to seriously consider moving training from Pohakuloa to a less sensitive area. Pohakuloa hosts 50 at-risk species and it has tremendous cultural significance. The military already operates on thousands of acres of land and hundreds of square miles of ocean and air space around Hawai'i. And regardless, they have plans to greatly expand Pohakuloa and other operations. You folks are saying you cannot manage without Pohakuloa, but the military said the same thing about Kaho'olawe and about Kapukaki, Red Hill, and they are going to manage without them. You are also saying you can't manage without the state land, since they built vital facilities there for electricity, drinking water, communications and roads. But the military knew that the lease was going to expire in 2029, so why did they put all that stuff there? The military has not lived up to its lease obligations on the state land. They failed to clean up unexploded ordinance, junk cars, an old tank, shell casings, white phosphorus and rubbish. There have been three fires in the past seven years.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Cory Harden		<p>Only about half of the needed archeological surveys have been done. No surveys have been done for nine years, and they claim they have not found even one traditional cultural property at Pohakuloa. They say this with straight face.                      The military has been negligent elsewhere. At Waikoloa unexploded ordinance has been not been cleared for decades. Kaho'olawe, one out of every four surface areas have not been cleared of unexploited ordnance. Kapukaki, the military claims the water is now safe, but people returning to their homes are reporting problems.</p>	<p>Section 3.4.2.1 ("Evaluation of Traditional and Cultural Properties Under NHPA"), clarifies that this EIS complies with the requirements of NEPA and HEPA and does not address compliance requirements under NHPA or HRS Chapter 6E.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Cory Harden		<p>The depleted uranium hazard at Pohakuloa is not well-addressed . I followed it closely for I think eight years, reviewing things, conference calls, including a hearing with the Nuclear Regulatory Commission talking to experts. It's not well-addressed. The military complains Congress does not give the money for cleanup or protection of environmental and cultural resources. But do they lobby as hard for that as they do for their new land and new weapons? Congress and many business people see the military as good for the economy, but the water contamination at Kapukaki means O'ahu may have to ration water and some new construction may be may need to be put on hold. The cost of eventual cleanup from that basis, from all the military toxins and unexploded ordnance, if the base ever closes, is just astronomical. Also, increased military presence in the state means increased crime, including increased sex trafficking and higher housing costs. Despite all these concerns, the military says it's not going to consider nonsubstantive comments like general objections, but if you have scores of people objecting that is something you need to listen to. Thank you.</p>	<p>Sections 3.5 and 3.6 discuss depleted uranium. Section 3.5.4.12 clarified to indicate surveys found no indication of depleted uranium-containing materials on the State-owned land.</p> <p>Section 3.5.4.12 notes that the Army completed a 1-year airborne uranium monitoring program in 2009 to determine if depleted uranium has impacted local air quality. Total airborne uranium levels collected from 210 air samples at PTA were within the range of naturally occurring uranium in Hawaiian soils and rock and were several orders of magnitude below the U.S. and international chemical and radiological health guidelines; therefore, the depleted uranium has not impacted local air quality.</p> <p>Section 3.6.4 discusses fugitive dust monitoring for depleted uranium at PTA, which concluded that depleted uranium has not impacted air quality at PTA or in the surrounding areas.</p>
Kye Harford		<p>I do not approve of the army's goal to retain these lands.I strongly believe the American military has no place for Hawai'i. Not only they trash the lands, but they lack respect for the people that lives here and the 'āina. Being at the Mauna Kea State Park and looking over to the PTA last month was shocking. A helicopter was hovering and there were large booming sounds. The next thing I saw was bullets being fired towards the ground. I grew up on Uchinaa (Okinawa) where the US military occupies large areas of the islands, and lived with aircrafts fly over us everyday and night, but have never actually seen bullets being fired. Again, it is wrongful for the army to continue to retain these lands.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Suzanne Hart		<p>I am in support of maintaining the lease at Pohakuloa. I believe having the military base is an asset as they provide assistance in times of disaster. It is also important to provide our military with training grounds that provide a variety of conditions. However, it would be lovely if Waikoloa Road could be widened to two lanes going uphill between Highways 11 and 190 as military traffic presents a significant hazard due to very slow-moving convoys, as well as causes very heavy damage to asphalt roadway. The military could also work on control of goats, pigs and sheep, all of which present traffic and environmental hazards.</p>	<p>Thank you for your comment. Widening of Waikoloa Road is outside the scope of this EIS; however, please see Section 3.3 (Biological Resources) of the EIS for information on the Army's natural resources management.</p>
Jazerick Hata		<p>Let it be known that I Jazerick Hata a student at UH Manoa, who's family served in WWII and who has strong ties to the Hawaiian community is torn and ashamed by the actions conducted by the US Army:</p> <p>The US Army has repeatedly showed the local and native communities complete disregard towards the environment and Hawaiian culture. Within the training areas multiple endangered species can be found (honohono, 'kio'ele, etc.) and while they remain endangered they are continually threatened by the armies actions. Whenever you have live fire training it destroys the land around it, an example of this is the navy's action on Kahoolawe which was systematically bombed to the point the island was stripped from vegetation. It is feared by many in the community that the actions of the Army have become to great and their actions have lead to generational damage to these sacred sites.</p> <p>It is critically important for future security that the Army shut this training area down and return the land to the state of Hawai'i. The relationship between the US Army and the Hawaiian community is more strained then ever, and at a time when unity is critically important this issue will last generations.</p> <p>You cannot undo the past, but the strongest and best advice to give it to start healing the now. Give back Puhakuloa.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Kevin Hedlund		I am in full support of PTA lease remaining as is due to the fact they have acted responsibly regarding the environment and cultural sites as well as improving the habitat of endangered species. If history is any indication of the ability of the activists acting responsibly regarding protecting the environment one need only look at what happen during the TMT protests. I hope the PTA continues and the leaders not be swayed by the minority. PTA is good for the island.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Pua Heimuli		I do not approve of the army's goal to retain these 23,000 acres of state-leased lands.  The Pōhakuloa region is home to many endemic, indigenous, and endangered plant and animal species. Any mitigation efforts by the Army will not be enough to make up for the impact it has and will have on the landscape.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Malia Heimuli		To whom it may concern, I am opposed to any military occupancy and activity in the Pohakuloa area of Hawaii Island. I urge the State of Hawaii and the U.S. Military to immediately stop the desecration of these lands and protect the cultural and natural resources found there. Malama pono, Malia Heimuli	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Devin Helton		Remove US military from occupied Hawaiian lands. Native plant and animal species are being devastated by the use of these lands for military purposes.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Neal Herbert		I totally support the EIS and the continued lease at PTA.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Jackie Hester		To whom it may concern: I fully support having the Pohakuloa Training Area and any and all activities they see fit in order to retain readiness! If they wanted to train in my backyard, I would feel the same. A strong military protects US all! GO ARMY!!! HOOAH ??????? Yes for the new lease! Bombs away! Lock and load! ?? Sign me, A Waikoloa Village Resident Jacqueline Hester ?? An American ?? Patriot Sent from my iPhone	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Linnea Heu		It is misleading and untrue to say that desecration and destruction of cultural sites is "mitigable through consultation with Native Hawaiians, and/or other ethnic groups as appropriate, to provide access to promote and protect cultural beliefs, practices, and resources," (pg 3-63). Consultation and access alone are not enough to mitigate this cultural damage. Continued destruction and disruption of culturally significant sites cannot be remedied without first ceasing the destructive actions and restoring access, which will only be done under the "No Action Alternative."  Additionally, in Table 3-24 (Potential Environmental Impacts), this EIS notes ". However, the increased risk of wildfire posed by Alternatives 1-3, have the potential to impact surrounding native shrubland and forest (managed by the State of Hawai'i) including habitat for the endangered Palila (Loxioides bailleui). Under the "No Action Alternative", while there will be a reduction in firefighting support, there will also be a decreased number of wildfires (pg 3-205 notes an average of 37 wildfires a year between 2012-2017, 60% of which were caused by military activities).  Finally, in 2019, in Clarence Ching and Mary Maxine Kahaleli vs. Susanne Case (Chairperson of BLNR), the Hawai'i Supreme Court found that the State of Hawai'i has a duty to inspect and monitor the lands leased to PTA. Testimony in this case referenced observations of "a range of debris left over from military exercises, including munitions and UXO, stationary targets, junk cars, an old tank, crudely built rock shelters, and other miscellaneous military rubbish." This is evidence that without constant and direct oversight from the State of Hawai'i, the military at Pōhakuloa are either incapable or unwilling to be responsible tenants and stewards of the land leased to them.	Thank you for your sharing your concerns. The Army understands its responsibilities for proper stewardship of the land and has the utmost respect for the Hawaiian Native population and cultural resources. Please see Section 3.4 (Cultural Resources) of the EIS for more information.

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Zahz HewLen		Option 4, allow the lease to end and deoccupy Pōhakuloa. Military occupation is a threat to Hawai'i people, native species, and our culture.	Thank you for your comment. The Army understands its responsibilities for proper stewardship of the land and has the utmost respect Native Hawaiians. Please see the revised Sections 3.3 and 3.4 (Biological and Cultural Resources) of the EIS and Appendix I for the CIA.
DJ High		Aloha, My name is DJ and although I am not Hawaiian I strongly believe that the US military should not occupy this space. The area of Pohakuloa is sacred for cultural and environmental purposes. By continuing to occupy and desecrate this land the United States military is continuing to do great harm to the people in the land of Hawai'i.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
DJ High		As a newcomer to these islands it is not my place to talk about the cultural history and trauma that the military has done but as a teacher in Hawaii schools for nearly 10 years it is my obligation to teach students about the actions and impacts of those actions all around us. In my last role I was a life science teacher and spent a great deal of time learning about native ecosystems and birds and other species that occupy those spaces. Our students have less and less opportunity with each day to see and love these spaces and the illegal occupation And practices of the military are exponentially decreasing the ability for Hawaiian students to connect to this place. A place that their ancestors knew so intimately. These places should be protected and preserved, not bombed and destroyed causing irreparable damage for generations. I strongly encourage the United States military to end their illegal occupation in these cultural and environmentally sacred spaces.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Rebecca Hill		Hi, my name is Rebecca Hill. I'm calling regarding the Pohakuloa Training Camp. This training camp has significant adverse impacts on Hawaiian culture, practices and resources, and this should be stopped at all costs. Again, I oppose the training camp in Pohakuloa, and, yeah, that's it. Thanks so much. Bye.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Selina Ho		I am writing to express deep opposition to the proposed retention of up to approximately 23,000 acres of state-owned land to support continued military training at Pōhakuloa Training Area (PTA) on the island of Hawai ' I and strongly support the fourth no-action alternative. We must cease the desecration of Pōhakuloa and treat the land and the indigenous Hawaiian people and cultures with the respect and honor they deserve.	Thank you for your comment. The Army understands its responsibilities for proper stewardship of the land and has the utmost respect for Native Hawaiians. Please see the revised Sections 3.3 and 3.4 (Biological and Cultural Resources) of the EIS and Appendix E for the CIA.
Craig Hodges		Hawaii requires authors of cultural impact assessments to disclose their personal bias. I cannot find this in the Cultural Impact Assessment despite the authors demonstrating a very definitive point of view. The lack of transparency calls the entire document into question. Do we need Honua Consulting logo on every page? If your going to remind me of the author on every page, put the bias disclosure on every page too.	Thank you for your correspondence. Your comment has been noted.
Emily Holmberg		Due to the disappearance of native bird species ('i'iwi, 'alalā, 'ua'u, 'elepaio, palila, and nēnē) from Pōhakuloa as a direct result of military occupation of the area, there is no way in good conscious that the U.S. military should be allowed to continue to use this 'āina for their own gain. Pōhakuloa must be de-occupied and returned to Hawaiian hands.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Gabrielle Holt		<p>I am writing to express my strong opposition to the army's renewal of their lease of 23,000 acres of ceded lands on Hawai'i Island (hereafter known as Pōhakuloa). As a resident &amp; Native Hawaiian, I cannot support this renewal. I must express my profound concern regarding the continued cultural, environmental, and societal harm caused by the military's mismanagement, broken promises, and destructive use of our most precious resources.</p> <p>First, I am gravely concerned about the use of depleted uranium in live-fire training on these acres. Dr. Lorrin Pang's statement regarding the dangers of aerosolized depleted uranium is illustrative of how destructive continued training on these lands will be for the future of Hawai'i.</p>	<p>Section 3.5.4.12 states "DU-containing munitions are no longer used at PTA." Section 3.5.4.12 also includes references noting that the depleted uranium did not aerosolize upon impact and per DODD 4715.11 high explosive munitions are not permitted to be fired into the same area as the depleted uranium impact locations.</p> <p>Section 3.5.4.12 notes that the Army completed a 1-year airborne uranium monitoring program in 2009 to determine if depleted uranium has impacted local air quality. Total airborne uranium levels collected from 210 air samples at PTA were within the range of naturally occurring uranium in Hawaiian soils and rock and were several orders of magnitude below the U.S. and international chemical and radiological health guidelines; therefore, the depleted uranium has not impacted local air quality.</p> <p>Section 3.6.4 discusses fugitive dust monitoring for depleted uranium at PTA, which concluded that the depleted uranium has not impacted air quality at PTA or in the surrounding areas.</p>
Gabrielle Holt		<p>Not only will this aerosolized depleted uranium be distributed throughout the air, it will settle back onto the land, threatening the groundwater beneath Pohakuloa. Groundwater that was, in fact, confirmed to be present by a 2015 study conducted by the Army and the University of Hawai'i. These groundwater resources are constitutionally protected Public Trust resources that are held in trust by the State for the benefit of present and future generations. Kaho'olawe's groundwater was already destroyed by Military impact; O'ahu's aquifers continue to be threatened by the presence of fuel tanks put in place by the Navy. Must Hawai'i island also suffer the same consequences? The specter of further irreparable harm to Hawai'i's constitutionally protected Public Trust resources weighs heavily against the approval of the Pohakuloa lease. Indeed, the Hawai'i Supreme Court has held that "the state has both the authority and duty to preserve the rights of present and future generations in waters of the state." In light of the recent and continuing egregious mishandling of the Red Hill/Kapūkakī water crisis, the military has lost all credibility and cannot be trusted to properly mitigate the known (and unknown) impacts that continued training at Pohakuloa will cause. The State must fulfill its duty under the Public Trust doctrine and reject the renewal of the Pohakuloa lease.</p>	<p>Monitoring for airborne DU concluded that the past use of DU had not impacted air quality at PTA or in the surrounding area. DU is discussed in Sections 3.5 and 3.6 of the EIS.</p>
Gabrielle Holt		<p>Second, the army's previous lease agreement of 23,000 acres for 65 years for the sum of \$1.00 is astonishing from a fiscal perspective. Considering the fact that 46,255 Kanaka Maoli remain on the Hawaiian Homelands Waiting List, the exploitation and destruction of such a large area of land for such insignificant benefit constitutes a wildly irresponsible use of ceded lands. The \$0.015 per year that the Department of Defense paid for the use of this land is so laughable as to be disrespectful. I urge the state of Hawai'i and the Department of Defense to reconsider this agreement from a monetary standpoint. Third, the Army has demonstrated that it cannot or will not comply with the bare minimum mitigation and remediation obligations that were required under the original agreement. In 2019, the Hawai'i Supreme Court ruled that the state has not fulfilled its responsibility in ensuring the military is being a respectful steward of this land.</p>	<p>Land retention negotiations, including compensation for use of the land, will be initiated following completion of the NEPA/HEPA process. The Army strives to comply with lease terms and was not a party to the lawsuit brought by Ching and Kaha'ulelio (referred to as Ching v. DLNR).</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Gabrielle Holt		<p>Part of the Army's agreement stated that the Army must " make every reasonable effort to ... remove or deactivate all live or blank ammunition upon completion of a training exercise." Yet - according to the highest court in the state, this has not been done . How, in good conscience, can the lease be renewed when the current agreement is not being respected? Finally, Pōhakuloa is known to contain a number of cultural and archeological resources that have never been properly cataloged, examined, or maintained. The United Nations Declaration of the Rights of Indigenous People states in Article 12 that "Indigenous people have the right to...maintain, protect, and have access in privacy to their religious and cultural sites..." These rights are similarly protected by state law. The renewal of this lease on this land will prevent Kanaka Maoli from doing just this and further risk the destruction of priceless cultural artifacts and history. And for what, a penny and irreparable water pollution? The history of the use of this land and its consequences have demonstrated a severe lack of forethought and respect for Hawai'i's 'āina and people. I want the children that I educate today to live in a Hawai'i that is not only the same Hawai'i I knew, but a better one. A clean Hawai'i calls for better management and stewardship that the Military is not capable of providing.</p>	<p>Land retention negotiations, including compensation for use of the land, will be initiated following completion of the NEPA/HEPA process. The Army is in compliance with the lease provisions and state law(s) that address the cleanup requirements.</p>
William Hoohuli		<p>I, want to thank the U.S. Army for letting me as a private civilian response to the Army Training Land Retention at Pohakuloa Training Area Draft Environmental Impact Statement (EIS), Island of Hawaii. I want to add my thoughts and opinions to the Army's public review.</p> <p>My understanding is the 132,000 acres that are leased (a 65-year lease expires on August 16, 2029). The Army proposes to retain up to 23,000 acres of State-owned land in support of continued military training. Right now, with so much uncertainty in the world, we cannot trust our adversaries but we can strengthen our forces in the event of a national threat.</p> <p>Since this is a real estate action that continues with ongoing military training use of the grounds/land. I can say from what I see, that the Pohakuloa terrain with hills and gullies is a great training ground. This area encompasses all seasonal training for the military. This area has some treacherous terrain with unpredictable weather conditions and sometimes snow. The retained land of 23,000 acres of rigorous training for the Army is a great need and benefit to the United States. 2.1.2 - Battle Area Complex pg.2-5</p> <p>The proposal requests to retain land for ongoing training but the land will be used for ball ammunition and rockets are not on state-owned land that uses live-fire exercises. So, this is on federal land by executive order? if so, this land will be part of 132,000 acres that will expire the lease in 2029.</p> <p>Aviation: I do see the need for required Aircraft training locations within the State-owned land including the FARPs, drop zone, landing zones, and Cooper Air Strip.</p> <p>Ammunition Management: I am glad to see safety first even with our training troops. Ammunition storage and Operations.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
William Hoohuli		<p>3.2.2 Land-use planning in the Army is guided by AR 405-10, Acquisition of Real Property and Interests Therein. This regulation sets forth the responsibilities, authority, policy, and procedures for the acquisition of real property and interests by the Army for military purposes. To me, these are important factors I was looking for. The Coastal Zone Management Act of 1972 (CZMA) (16 U.S.C. Section 1451), as amended, The Sikes Act (16 U.S.C. Section 670a-670o), as amended, Hawai'i has a unique system of classifying and managing lands in which both state and county agencies hold distinct responsibilities. HRS Chapter 205, State Land Use Law, was adopted in 1961 and established a framework of land use management and regulation in which all lands in the State are classified into one of four land use districts. Section 5.3.2 and Section 3.2.4.1 Here are some important things that were on my mind and listed just to let you know how this may impact the community.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
William Hoohuli		<p>Alternative 1 – long-term, minor, adverse impacts on water resources due to ongoing ground disturbance within the State-owned land retained pg. 3-139 and 3-140. This has me a little worried. I have read through this portion and copied this section because of the vulnerability to contamination. Although, your research and study show low in other areas this portion specifically may cause some concerns and need to be tested periodically. The State Water Code, HRS Chapter 174, The SDWB administers these programs through Underground Injection Control (UIC) and groundwater protection. The State-owned land is located above the UIC line indicating that the site overlies a potential drinking water source, the groundwater contains less than 250 milligrams per liter of chloride; the uniqueness is "irreplaceable"; and the vulnerability to contamination is classified as "High," due to the classification of both aquifers as unconfined (Mink &amp; Lau, 1993) as stated in the proposal. One more thought that came to mind aside from this proposal. I want to address that Makua and Schofield are equally important and designed for specific uses for the readiness of our troops. Since these two bases have been upkept and periodically maintained over the years. The military has a big responsibility to continue to ensure the same air quality, hazardous materials, waste, public health, and safety for the private citizens of Hawaii. Pohakuloa will be an ideal location for training our troops to face biological and environmental national threats.</p>	<p>Groundwater and surface water quality are discussed in Section 3.9 of the EIS, and notes that there are no perennial streams in the area and low annual rainfall and highly porous rocks prevent regular monitoring of surface water. Impacts from maneuver training activities are monitored and managed through implementation of existing management measures, which utilizes Best Management Practices to reduce erosion and runoff.</p> <p>Section 3.9.4.3 of the EIS describes that surface water quality studies are limited as the intermittent streams cannot be regularly sampled.</p>
Misty Houchens		<p>As a teacher of Pacific Island children, including many from the Marshall Islands, of which the US military have poisoned their homelands with nuclear testing and are refusing clean up their mess. I think the continued use should be contingent on the clean up and removal of the nuclear waste in the Marshalls . If they don't take care of their messes from the past, they won't take care of their messes in the future. The US Navy is currently poisoning the waters of Oahu , is Hawaii Island next? The US army should do what's right or pono and find an area on the mainland that has already been destroyed and build a training base there. No kuleana and malama no lease renewal. Mahalo</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Bailee Houle		<p>You need to go. You are not welcome here. Enough is enough. Use this money and time to help the earth and humans instead of continuous destruction to the island. You have all proven yourselves to be immoral, untrustworthy, greedy, and truly do not care about the harm you bring to people and the planet. It's repulsive. Men need to step down in general - clearly you're all doing an absolutely horrendous job. Like it's 2022 you Neanderthals. Grow up. Get a life. Go do something productive with your time here on earth. I do not support any occupation of hawaiian land for us government and military use. I don't think anyone who has a brain supports the government or military in general at this point. We don't want you. Go grow some food or something useful or helpful. This ain't it.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Annelise Houston		Our military is a major polluter on our Earth and always has been. Our tiny islands cannot sustain them any longer and they need to leave this precious island of Hawaii. With live volcanos, 10 of the 14 climates zones and surrounded by our ocean full of life that the runoff from the continued poisons are killing. Our reefs, coral and fish are dying from toxic waste, poisons, etc. being sprayed, bombed and put in our soils... enough is enough! Don not let this continue with your no vote. Thank-you, Annelise Houston	Thank you for your comment. The Army understands its responsibilities for proper stewardship of the land and has the utmost respect for Native Hawaiians. Please see the revised Sections 3.3 and 3.4 (Biological and Cultural Resources) of the EIS and Appendix E for the CIA.
Allan Hyatt		Having trained at this site while stationed in Hawaii, I found it very valuable.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Kilihea Inaba		<p>Mahalo for the extensive EIS that provides a framework to understanding the potential adverse effects as well as benefits that that Alternatives 1, 2, 3 and No Alternative have on the land, resources, and people. Sections of the Environmental Analysis - 1) Land Use 2) Biological Resources 3) Cultural Resources 4) Hazardous and Toxic Materials and Wastes 5) Air Quality and Greenhouse Gases 6) Noise 7) Geology, Topography, and Soils 8) Water Resources 9) Socioeconomics 10) Transportation and Traffic 11) Airspace 12) Electromagnetic Spectrum 13) Utilities 14) Human Health and Safety 15) Protection of Children</p> <p>3.11.6.1 Alternative 1: Full Retention CONCERNS: - In regards to Water Resources, the EIS references Mink &amp; Lau 1993 for the Aquifer Codes created that list Anaehoomalu and Waimea aquifer systems as "high-level, unconfined, dike-impounded aquifers." In this classification scheme, both these aquifers are listed as "high" in their vulnerability to contamination as they are both unconfined. Though it states the salinity of groundwater is "fresh," this study was done nearly 30 years ago and should not be used in this EIS to support the supposed low impact PTA has on these aquifers. A new and updated study should be completed to show that since 1993 there has not been any contamination of the aquifers</p>	<p>Section 3.9.4.6 has been added to the EIS and documents the existing management measures utilized by the Army to protect water resources. Groundwater and surface water quality are discussed in Section 3.9 of the EIS. The Mink &amp; Lau 1993 reports serve as the framework for a groundwater protection strategy, utilized by the State, that classifies and assigns codes to the principal aquifers. The State Department of Health (DOH) Safe Drinking Water Branch (SDWB) monitors groundwater quality of aquifers as described in EIS Section 3.9. SDWB has released groundwater contamination maps for Hawai'i Island that show most contamination is along the eastern coast of the island. You can learn more directly from the source cited in this section, the DOH SDWB Environmental Health Portal at <a href="https://eha-cloud.doh.hawaii.gov/sdwb/#!/home">https://eha-cloud.doh.hawaii.gov/sdwb/#!/home</a>.</p> <p>There is no extraction from groundwater wells [test holes] in the State-owned land, so no data is available for the PTA area (other than information for the Waiki'i Ranch production well in EIS Section 3.9).</p>
Kilihea Inaba		<p>The EIS states that approximately 11,920 acres have not been surveyed. In regards to both surveyed and unsurveyed lands, what people or kupuna have you spoke and/ or sat with to learn about what Ka'ohe was used for by ancient Hawaiians?</p> <p>You should also note that the EIS states that thirty-one surveys have been completed and "primarily have been generated from regulatory compliance needs" associated with development in the region; yet kanaka are the ones who should be consulted with.</p>	<p>EIS Section 3.4.4.3 has been revised to describe why certain areas have not been surveyed. Figures have been added to show where surveys have been completed and the general locations and types of sites within State-owned lands.</p> <p>Section 3.4.4.4 of the EIS and Sections 5.0 and 6.0 of the CIA have been revised to reflect additional information provided by interviewees who responded to a second request for input in December, 2022, following the height of the COVID-19 pandemic.</p>
Kilihea Inaba		<p>"Within TA 22, Site 23694 is situated within the 'C' (Charlie) lava tube cave system,.. A subsequent site visit by PTA CRM staff in 2003 documented iwi kupuna at Site 23694 along with an artifact scatter containing lithic debitage, water-worn stones, and gourd fragments. A circular-shaped hearth containing charcoal, ash, and bird bone was also noted near one of the cave entrances." This is only one reference to a historical and cultural finding. Need I not say that there are more sites in this Ka'ohe Mauka region that have either been identified and not recognized in this EIS or have not yet been identified at all.</p> <p>These are only two out of the fourteen sections that I am speaking to.</p>	<p>Historic and cultural resources known from the State-owned land at PTA, and the Army's management program for these resources, are described in Section 3.4 of the EIS. Table 3.8 lists the 105 archaeological sites that have been identified on State-owned land through past surveys.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Kilihea Inaba		<p>"Adverse impacts related to land use, cultural resources, and transportation and traffic would disproportionately affect low-income and minority populations, including Native Hawaiians. The respective resource sections, however, indicated that the impacts would be minor or mitigated, and there was no indication that the impacts would be harmful to the health or environment of the environmental justice populations..." - The EIS then states that this would have a "Less than significant" impact and does not have any potential mitigation measures recommended. Within the fine print of each of these sections, the reader can gather that there are a multitude of adverse impacts that would continue as a result of Alternative 1: Full Retention No Action Alternative - "Summary of Impacts: Under the No Action Alternative, none of the resources that were analyzed would result in a significant impact on environmental justice." It is evident that continuing to use the state-"owned" land by the U.S. Military displaces and again "disproportionately affects low-income and minority populations, including Native Hawaiians."</p> <p>Questions: 1) How do any Alternatives other than No Action Alternative benefit the people of Hawaii island, culturally, physically, spiritually, economically? 2) As the DLNR is fully aware of the harmful impact that PTA has had, what would the U.S. Army do differently (than has not been done already) to mitigate the adverse effects caused?</p>	<p>The EIS has been revised to better characterize, and mitigate as available, the continued effects on minority populations, including Native Hawaiians, in the broader context of historic inequities, cultural land values and access to traditionally important or sacred sites.</p>
Kilihea Inaba		<p>The EIS references management measures to care for the land. Has any of that been done since 2008 when Hawaii County Council voted on a resolution 639-08 to have the army stop all live-fire at PTA and clean up the DU present. What has been done in regards to this? Thank you for your time in this matter, Kilihea Inaba</p>	<p>The Army makes every effort to be good a neighbor and steward of the environment; however, Hawaii County Council resolutions express policy or opinions and therefore are not compulsory to the federal government.</p> <p>In accordance with the lease and under the provisions of existing law, the Army retains responsibility for cleanup and restoration of former training areas. After the lease expires, if deemed necessary, the Army would follow Army regulations to determine how and when the cleanup and restoration of State-owned land not retained would occur, following the CERCLA process.</p>
Kilihea Inaba		<p>(Shantee Brown reading testimony from Kilhea Inaba)...Mahalo for the EIS and some of her concerns for 3.11.6.1, alternative and full retention.</p> <p>In regards to water resources, the EIS references Mink and Lauer 1993 for the aquifer codes created that list 'Anaeho'omalua and Waimea aquifer systems as high level, and combined they compounded aquifers. In this classification scheme, both these aquifers are listed as high in their vulnerability to contamination as they are both unconfined. Though it states the salinity of ground water is fresh, this study was done nearly 30 years ago and should not be used in this EIS to support the supposed low impact ETA has on these aquifers. A new and updated study should be completed to show that since 1993 there has not been any contamination of the aquifers.</p>	<p>Section 3.9.4.6 has been added to the EIS and documents the existing management measures utilized by the Army to protect water resources. Groundwater and surface water quality are discussed in Section 3.9 of the EIS. The Mink &amp; Lau 1993 reports serve as the framework for a groundwater protection strategy, utilized by the State, that classifies and assigns codes to the principal aquifers. The State Department of Health (DOH) Safe Drinking Water Branch (SDWB) monitors groundwater quality of aquifers as described in EIS Section 3.9. SDWB has released groundwater contamination maps for Hawai'i Island that show most contamination is along the eastern coast of the island. You can learn more directly from the source cited in this section, the DOH SDWB Environmental Health Portal at <a href="https://eha-cloud.doh.hawaii.gov/sdwb/#!/home">https://eha-cloud.doh.hawaii.gov/sdwb/#!/home</a>.</p> <p>There is no extraction from groundwater wells [test holes] in the State-owned land, so no data is available for the PTA area (other than information for the Waiki'i Ranch production well in EIS Section 3.9).</p>
Kilihea Inaba		<p>Her second point is that the EIS states that approximately 11,920 acres have not been surveyed. In regards to both surveyed and unsurveyed lands, what people or kupuna have you spoke and/or sat with to learn about what kaohu was used for by ancient Hawaiians. You should also note that the EIS states that 31 surveys have been completed, and primarily have been generated from regulatory compliance means, associated with development in the region. Yet kanaka are the ones who should be consulted with.</p>	<p>The EIS has been revised to describe where surveys have been completed and the general locations and types of sites within State-owned lands.</p> <p>Section 3.4.4.4 of the EIS and Sections 5.0 and 6.0 of the CIA have been revised to reflect additional information provided by interviewees who responded to a second request for input in December, 2022, following the height of the COVID-19 pandemic.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Kilihea Inaba		<p>Within TA22-23694 is situated within the sea lava tube cave system, a subsquiscient -- sorry. I can't read -- site visit by TCACRN staff in 2003 documented iwi kupuna site 23694, along with an (indiscernible) scattered containing lithic debutage, water stones and gourd fragments. A circular shaped hearth containing charcoal, ash and gray bone was also noted near one of the cave entrances. This is only one reference to historical and cultural findings. Need I not say that there are more states in this kaohe mauka region that have either not been identified and not recognized in this EIS or have not been identified at all. Two other points. Out of the 14 sections that she's speaking to are adverse impacts related to land use, cultural resources, and transportation and traffic, with -- do I have to stop? Would disproportionately affect low income and minority populations, including native hawaiiians. The respective resource sections, however, indicated that the impacts would be minor or mitigated, and there was no indication that the impacts would be harmful to the health or environment of the environmental justice populations.</p>	<p>Historic and cultural resources known from the State-owned land at PTA, and the Army's management program for these resources, are described in Section 3.4 of the EIS. Table 3.8 lists the 105 archaeological sites that have been identified on State-owned land through past surveys.</p> <p>Section 3.11 of the EIS considers the analyses within the EIS through the environmental justice lens.</p>
Kilihea Inaba		<p>The EIS then states this would not have, or this would have a less than significant impact and does not have any potential mitigation measures recommended. Within the fine print of each of these sections the reader can gather that there are a multitude of adverse impacts that would continue as a result of alternative 1 retention. It is evident that continuing to use the state-owned land by the U.S. military displaces and again disproportionately affects low income and minority populations including native Hawaiians.</p> <p>Her questions: How do any alternatives other than no action alternative benefit the people of Hawaii island culturally, physically, spiritually and economically? Also as the DLNR is fully aware of the harmful impacts that PTA has had, what will the U.S. Army do differently that it was not done already to mitigate the adverse effects caused? The EIS references management measures to care for the land. Has any of that been done since 2008, when Hawaii County Council voted on a Resolution 69-08 to have the Army stop all live fire at PTA and clean up the residue present. What has been done in regards to this?</p>	<p>Sections 3.4, 3.10, 3.11, and 3.16 of the EIS discuss the cultural, socioeconomic, environmental justice, and health and safety impacts of the Proposed Action.</p> <p>EIS revised to include current management measures the Army implements and would continue to implement for ongoing activities. No new mitigation measures for hazardous substances and hazardous wastes are proposed because the Proposed Action does not include new activities and the Army complies with Army, federal, and state regulations as well as various Army Standard Operating Procedures for hazardous substances and hazardous wastes.</p> <p>As noted in Section 3.5.4.11, soldiers are required to collect casings from spent rounds, wood boxes, and other solid waste debris generated during live-fire training and return them to the ammunition holding area and ammunition supply point for recycling or disposal, as appropriate.</p> <p>Sections 3.5 and 3.15 supplemented with relevant information from PTA Range Operations Standard Operating Procedures regarding cleaning ranges after training.</p> <p>The Army's cleanup efforts after training exercises are discussed in Section 3.5.4.11. Text clarified to note that the Army removes or deactivates all live and blank ammunition upon completion of a training exercise in compliance with the lease and removes solid waste prior to departing a training area or range facility in accordance with the U.S. Army Garrison, Pohakuloa (USAG-PTA) External Standard Operating Procedures (2018).</p> <p>In accordance with the lease and under the provisions of existing law, the Army retains responsibility for cleanup and restoration of former training areas. After the lease expires, if deemed necessary, the Army would follow Army regulations to determine how and when the cleanup and restoration of State-owned land not retained would occur, following the CERCLA process.</p> <p>The Army makes every effort to be good a neighbor and steward of the environment; however, Hawaii County Council resolutions express policy or opinions and therefore are not compulsory to the federal government.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Alan Jacobsen		<p>As the President of IAFF Local 263, we see from the inside out that the Army is not properly protecting the area they are leasing from the state. The fire department that is required to protect the base is not funded correctly, does not have the proper equipment or personnel to mitigate emergencies. For years the Army has turned a blind eye to the request by our union to bolster the personnel and to hire competent individuals who will be invested in the fire department. Instead they expect our men to fight fire and provide emergency services with broken vehicles and outdated safety equipment. This union will be at every meeting from here on out so the state and public tax payers are aware of what the army is really providing. 1 dollar a year should get the state a better deal than what they are receiving now. This union has never asked for more than the basics of what they deserve , this isn't a camping mission for our members , congress spent millions to build a new fire station that hasn't been opened for 7 years, yet the Army continues to build new barracks for their troops at the cost of over 1 million dollars. Our members who represent the Federal Fire Department and protect the Army's bases on Oahu wouldn't be caught dead working for a dilapidated dept such as PTA. If the training was that important to America and this states security I would start with protecting its natural resources and investing in the men and department who is on the front line.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Rick John		<p>I'd like to say Aloha to all the people here that's perpetuating aina, that's here for these lands, here to grow food, here to love this land. So I think there is no way, there is no way you guys can lease and keep playing these gimmicks. You guys are brainwashed to think you guys are courageous. They brainwash you to think by guys are courageous by desecrating and bombing. Say we're bombing. We're testing bombs. To test, to take it to other places to bomb, where there is people, and those people is me here. I'm at war. I'm at war with you guys. Maybe not you specifically, but the dead entity of the Army I'm at war with. My people are here, I'm here getting hit with all the bombs. Getting hit where all the aina being taken. I am here, and my keike is here, as a Hawaiian here. So to say you guys are courageous doing these things, practicing on bombs and, yeah, we're going to kill people over here. You are already bombing. We are at war with you guys. You guys are the people we are at war with, and I don't understand how you guys don't know this. I'm younger than both you guys, and I understand this. As a human we learn these. We know every human has feelings. We know that we take care of others. We take care of the lands. Brah, we not going anywhere else. Elon Musk thinks we flying somewhere else. I am not leaving this aina. I am not leaving Hawai'i. I am Hawai'i. And for you guys to think you can just come here and kill off everything and then live, there is no way, there is not way this lease is going to keep going. You guys perpetuating death.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Rick John		<p>We here to perpetuate aina to make food. We can't survive off of anybody. Brah, this place grows everything. It flourishes. We can't rely on nobody. Gas is getting crazy. Brah, we have three growing seasons. We can grow so much here, everything, but you guys want to bomb and kill, and that I don't understand. And that's all I have got to say. Maybe after this end put some posters up for the people. Perhaps the U.S. Army signature on everything. You desecrate everything already. We don't need that. So as men, as humans, I'd love to talk to you guys one-on-one. Maybe not change the Army's mind about nothing, but maybe you guys to look. To say that you guys are coming here and doing something noble, I don't understand that. That don't make no sense to me. That's like me going to you guys' houses with guns and telling your people to move and leave. I know this is all gimmicks, Brah. You guys have guns. You guys have so much to kill. People telling you is not going to change. Maybe in your hearts one by one you guys can leave the Army, change, but you guys get guns. How we going to move you with guns? We know for nothing. So maybe if you just talk to me one-on-one, we can work something out with just you two, because I don't need to go off anybody else. I don't need go after anything, but maybe you guys can see what it's like as a Hawaiian in Hawai'i, not in America. Mahalo.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Cora Johnson		<p>My name is Cora Johnson. C-O-R-A, J-O-H-N-S-O-N. I was raised in Las Vegas, a place where many Hawaiian people have been displaced to, and that is due to a number of reasons, but it is directly correlated to the illegal overthrow. They have been displaced and forced to leave their home, their aina, and move to another place that was also stolen and also has a lack of food. And so I would just like to bring attention to the many people on these lands and elsewhere that don't have adequate access to food, to sustenance. Even in a place like this, that food can be grown abundantly all year long, everybody could be fed easily. Everybody here could be fed. But they are not, and that is largely due to the illegal occupation. That is directly because of the illegal occupation, and the actions that are taking place by us ripple out.</p> <p>Every action affects everything around us, especially on an isolated island in the middle of the ocean where 90 percent of our food is imported. All of the food could be grown here. Kids don't need to be hungry. Hawaiian people don't need to be hungry. They deserve access to their native foods.</p> <p>So I would just like to bring attention to those people that aren't able to be here today, the families that aren't able to make it because they are struggling to provide for their families. I would like you all to just consider those people as you consider if this lease should be continued. Obviously, I disagree. I would like to thank you guys for being here and listening, and just think about the resources that you use while being here. Is there an adequate give and take happening? Is this a reciprocal relationship between you and the land that you stand on, the air you breathe, the people, the community that you are around. I think all of us need to consider these things while we are in these lands and while we are making decisions regarding this land, and all of the people and life, all the animals that exist here. Thank you for listening. Mahalo.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Jessica Johnson		<p>I would love to see Hawaii's sovereignty restored completely. Thank you.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Roger Johnson		<p>That land could be used to house Native Hawaiians who currently can't afford to live here. Land is precious here, plentiful elsewhere.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Martha Johnston		The people of Hawaii do not support this and it is time for the government to respect their sovereignty. This is unethical and the people need to be able to have a say in how the aina is being utilized. The United State's illegal occupation of the country of Hawaii has left the native people in a constant battle to protect the natural resources and their livelihood. Our planet needs to be nourished not desecrated. Thank you. Let Hawaiians have a say in how their small islands function and thrive. LAND BACK.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Andrew Jones		There recently was a video posted by the US Army regarding the Pōhakuloa Training Area on the island of Hawai'i. One of your officers said the Army has a great relationship with the Native Hawaiians and the upmost respect for the Hawaiian land. Actions speak louder than words. Is it respect when you release gasses like white phosphorus from munitions into the land and air? Is it respect when you directly contradict the will of Native Hawaiians who ask you to stop using their land for target practice? Please do the moral action and end your lease at Pōhakuloa, and honor your own words by respecting the 'āina and your relationship to Native Hawaiians and the residents of Hawai'i.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Michael Jones		<p>comments on the Pohakuloa Training Area (PTA) draft EIS submitted by email to : ATLR-PTA-EIS@G70.DESIGN on 18 May 2022 from : Michael Jones ** Please confirm receipt of these comments.</p> <p>** 1) inadequate responses to scoping comments My scoping comments I-149 are on pages 447-8 of Vol. 2. Comment 3 stated that the EIS should indicate where the Davy Crockett ranges noted in section 3.0 of the 2010 PTA Baseline Human Health Risk Assessment (BHHRA) are located. The draft EIS does not contain maps in which these ranges are identified. These ranges are identified in the (CABRERA, 2009) memo cited on BHHRA page 3-1 but this memo is not cited in the draft EIS and apparently was not reviewed for it. Comment 4 asked whether the survey of range 11T recommended by CABRERA in the BHHRA had been done. There is no response in the draft EIS even though some relevant information is in the (CABRERA, 2009) memo. ----- The (CABRERA, 2009) memo is at <a href="https://www.nrc.gov/docs/ML0929/ML092950352.pdf">https://www.nrc.gov/docs/ML0929/ML092950352.pdf</a> It has U.S.NRC cover page dated 16 Oct. 2009 title page by Cabrera Services dated 24 July 2009 Technical Memorandum for PTA Aerial Surveys Map in Fig. 2-2 shows DC Area #1 (range 17), and ranges 13+14,11T,and 10. -----</p>	<p>The State-owned land only contains a portion of a firing location for one of the four former Davy Crockett ranges. Section 3.5.4.12 identifies this firing location as being Range 13 on Training Area 9, which is visible on Figure 1-3.</p> <p>A summary of health and risk assessments from past use of depleted uranium at PTA is described in the EIS. Individual soil sampling results and locations are not necessary to assess the impacts from continued use of the State-owned land. Surveys did not identify any indication of depleted uranium-containing materials on the State-owned land.</p> <p>Surveys, sampling, and existing conditions of areas that are outside of the State-owned land and would not be impacted by continued use of the State-owned land (e.g., Range 11T) are outside the scope of the EIS.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Michael Jones		<p>2) preferred alternative seems to have been decided Section ES.4 contains the following statement: "The Army will decide on and identify a preferred alternative in the Final EIS." However section ES.6 states that the "Army proposes to retain up to approximately 23,000 acres of State-owned land at PTA." This would be done by "attaining a land interest that would allow continued use of the land." The specific land retention estate "would not be selected until after completion of this EIS." Thus it appears that the Army's preferred alternative is full retention together with a real estate action to enable continuation of ongoing activities on state-owned land. The responses to scoping comments about alternatives on page B-5 of Appendix B contains the following about land retention estates: "The alternatives do not incorporate the various land retention estates because the conditions that would be negotiated between the Army and State for each land retention estate are not known and it would be extremely cumbersome and difficult for readers to understand, particularly for alternatives that might work best with a combination of land retention estates." Therefore, even though the draft EIS views the proposed action as a real estate action, it avoids discussion because it would be "cumbersome and difficult for readers to understand." 3) impacts for alternatives favor minimum retention. Page ES-5 has a statement that impacts for alternatives 1-3 are "less than significant or significant but mitigable to less than significant" and that significant impacts are only for the no action alternative. Page ES-6 notes, "In general, there are anticipated beneficial impacts associated with decreased military activities on State-owned land not retained." Thus it appears that alternative 3 (minimum retention) would have beneficial impacts due to decreased military activity but no significant impact on Army training.</p>	<p>As recommended in DHHL comments, the EIS has been revised to remove the 250 acres of DHHL-administered land from Alternative 1. Consequently, the 250 acres of DHHL-administered land are no longer considered for retention by the Army in any alternative.</p> <p>The Proposed Action is discussed in Section 2.1 of the EIS and has been revised to state the Army proposes to retain up to approximately 22,750 acres of State-owned land at PTA in support of continued military training.</p> <p>The Army's preferred alternative has been added to Section 2.4.</p> <p>EIS revised to provide analysis where impacts vary based on land retention estate, including impacts related to assumed State conditions under State-owned estates (i.e., lease, easement).</p>
Michael Jones		<p>4) subjective criteria used to evaluate alternatives. Table 2-2 summarizes the evaluation of 6 alternatives on 5 criteria. Only alternatives 1, 2, and 3 satisfy all criteria for further analysis. However, these criteria seem subjective and it is not clear how it is determined whether the alternative fully meets, partially meets, or does not meet the criterion. For example, alternative 5 is eliminated because it does not meet criterion 1. The discussion of alternative 5 is contained in a single paragraph on page 2-17. Apparently, the Army objects to the provision that it would be "subject to restrictions on the types of training and future modernization that would be permitted by the State." However, the State has an obligation of oversight; in 2019 the Hawaii Supreme Court ruled that the State breached its trust duties at Pohakuloa. What kind of oversight would meet criterion 1? 5) alternatives not considered The quantity of land to be retained for Army training is 10,100 acres for alternative 3 and zero for No Action. Page 2-14 has the statement "training capabilities at PTA would be moderately reduced" for alternative 3. Why are there no alternatives where the amount of land retained is between zero and 10,100 acres? Poster 8 in the Scoping Documents section of the PTA EIS website indicates that the specific area to be retained in the minimum retention alternative is "to be refined in the EIS." This suggests some uncertainty about the minimum area needed.</p>	<p>As noted in Section 2.1.4, the screening criteria are based on the Army's purpose of and need for the Proposed Action.</p> <p>Section 2.2.5 revised to better explain why those alternatives did not meet the screening criteria or purpose of and need for the Proposed Action.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Michael Jones		<p>6) information about Davy Crockett missing from maps Fig. 1-3 on page 1-13 shows training areas and other features . Existing ranges adjacent to TAs 7,8,9 and along boundary of TA 21 are outlined in black but not identified by number. Fig. 2-1 on page 2-3 is a large fold-out map which identifies PTA training areas by number but does not show Davy Crockett ranges. The Summary of Existing Site Data in BHHRA section 3.0 lists potential Davy Crockett ranges as 10, 11T, 14 and 17 with 11T most likely to have SRB. These ranges are not identified in the draft EIS. The second paragraph on page 3-81 states that Davy Crockett was fired partially from State-owned land from one (range 13 on TA 9) of four ranges. The other ranges are not identified in the draft EIS and none of the maps show the location of range 13. However, Fig. 2-2 in the (CABRERA, 2009) report shows 9 sampling locations and DC areas superimposed on a satellite photo. DC Area #1 (range 17) and ranges 13+14,11T, and 10 are shown. The sampling locations are: 2 on range 13+14, 2 outside range 11T, 3 inside 11T, 2 on range 10 Table 2-1 contains U-233,U-235,U-238 levels in 9 soil samples. The map and table should be included in the final EIS. A version of the map in good focus should be obtained.</p>	<p>The State-owned land only contains a portion of a firing location for one of the four former Davy Crockett ranges. Section 3.5.4.12 identifies this firing location as being Range 13 on Training Area 9, which is visible on Figure 1-3.</p> <p>A summary of health and risk assessments from past use of depleted uranium at PTA is described in the EIS. Individual soil sampling results and locations are not necessary to assess the impacts from continued use of the State-owned land. Surveys did not identify any indication of depleted uranium-containing materials on the State-owned land</p> <p>Surveys, sampling, and existing conditions of areas that are outside of the State-owned land and would not be impacted by continued use of the State-owned land (e.g., Range 11T) are outside the scope of the EIS.</p>
Michael Jones		<p>7) missing information on soil samples The last paragraph on page 3-81 states that no indication of DU was found in soil samples taken in 2007. No data are given but they are available in Table 2-1 of the (CABRERA, 2009) report. ----- The following text from the BHHRA indicates limitations of existing data on DU and recommends a survey of range 11T. "The visual and scanning surveys did identify non-oxidized metal fragments, partial spotter round bodies, and Davy Crockett system components on Range 11T consistent with DU and the Davy Crockett weapons." "While the soil samples collected around the perimeter and impacted areas of the range did not indicate the presence of DU, these data do not represent a statistically significant data set. A statistical field sampling design focused on the suspect Davy Crockett impact areas would hopefully yield more representative results. However, due to the general lack of the presence of traditional well developed soil, slightly weathered or unweathered volcanic rock predominates in some locales; thus, obtaining traditional soil samples typically used for risk assessment purposes will be problematic. CABRERA recommends that the Army attempt to conduct a characterization survey of the most impacted range (11T), with an emphasis on statistical sampling, defining the environmental characteristics of the impacted area, eliminating pathways, where possible, from further evaluation, and developing better statistically based data." -----</p>	<p>A summary of health and risk assessments from past use of depleted uranium at PTA is described in the EIS. Individual soil sampling results and locations are not necessary to assess the impacts from continued use of the State-owned land. Surveys did not identify any indication of depleted uranium-containing materials on the State-owned land.</p> <p>Surveys, sampling, and existing conditions of areas that are outside of the State-owned land and would not be impacted by continued use of the State-owned land (e.g., Range 11T) are outside the scope of the EIS.</p>
Michael Jones		<p>8) other information from the (CABRERA, 2009) report but not in the draft EIS PTA surveys were done by CABRERA from 10/28/2008 to 12/12/2008. Fig. 3-1 shows ranges and impact area south of TAs 5, 7-9, and 12-13. Table 4-1 gives uranium levels in 20 surface soil samples in ranges 10, 11T, and 17 taken near DU fragments and finds in 10 and 11T. Photo 4-1 : mostly intact SRB found on 11T with intact explosive Photo 4-2 : partial SRB found on 11T with fin assembly Gamma Walkover Surveys (GWS) found 5 locations in the BAX construction area of 11T with count rates 34000 to 44000 cpm compared to area norm of 2500 cpm. Fig. 4-3 shows GWS coverage for BAX, 10, and 11T. Fig. 4-4 shows GWS results and color-coded cpm levels. Fig. 4-5 shows GWS results and color-coded cpm levels for BAX, 10, and 11T. 9) inappropriate reference to Waikii Ranch Homeowners' Assoc. The 4th line on page 3-81 cites the Waikii Ranch Homeowners' Assoc. for the statement that low energy alpha particles do not penetrate skin. This is a correct statement but it is bizarre to cite a homeowners' association for it. I did find a report from July 2008 <a href="http://hawaiiexpress.com/Portals/0/Article%20Attachments/Depleted%20Uranium%20waikii_ranch%202008.pdf">http://hawaiiexpress.com/Portals/0/Article%20Attachments/Depleted%20Uranium%20waikii_ranch%202008.pdf</a> that contains a statement about alpha particles in the report about DU to the Waikii Homeowners' Assoc.</p>	<p>The status of Davy Crockett components and depleted uranium testing in U.S. Government-owned land not impacted by continued use of the State-owned land is beyond the scope of the EIS.</p> <p>Section 3.5.4.12 revised with a more appropriate reference for radioactivity and alpha particle emissions of depleted uranium.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Michael Jones		10) request for documents I would like to review the documents with the following references cited in the PTA draft EIS Vol 1. cited on page 3-81 Waikii Ranch Homeowners' Association, 2008 USDHHS, 2008 USACE-POH & USAG-HI 2017a USARHAW, 2020 other references USARHAW, 2021 USARHAW, undated	To the extent feasible, current on-line URL links are provided in Chapter 6 (Reference List) following the reference citation. The USAG-HI website for current publicly releasable documents is: <a href="https://home.army.mil/hawaii/ptaeis/project-home">https://home.army.mil/hawaii/ptaeis/project-home</a> .
Michael Jones		<p>comments on the Pohakuloa Training Area (PTA) draft EIS submitted by email to: ATLR-PTA-EIS@G70.DESIGN on 31 May 2022 by Michael Jones</p> <p>These comments supplement those I submitted by email on 18 May 2022. As part of my previous comments on the PTA draft EIS, I requested access to 6 documents cited therein. I've received no reply so far from G70.DESIGN. I sent my request to the Army's NEPA Program Manager on 18 May also. I got email on 23 May explaining how I could access these documents. Within an hour I got another email from the same person saying the documents were not available because they were undergoing some sort of review.</p> <p>On 26 May I received email with attachments for three documents and a link for one. The following was all that was provided for two documents: 4. USACE-POH &amp; USAG-HI 2017a. ECOP. (FOR OFFICIAL USE ONLY, not attached). 5. Waikii Ranch Homeowners' Association, 2008. Depleted Uranium Report by Waiki'i Ranch Homeowners Association. (No contact from author for dissemination, not attached).</p> <p>Document 4 is cited 4 times in the discussion about depleted uranium on page 3-81. The 2nd paragraph discusses Davy Crocket ranges including statements that range 13 is partially on State-owned land and that the other three ranges are entirely on U.S. Government-owned land. It seems likely that this reference has relevant information. Some explanation for not providing it is needed.</p>	To the extent feasible, current on-line URL links are provided in Chapter 6 (Reference List) following the reference citation. The USAG-HI website for current publicly releasable documents is: <a href="https://home.army.mil/hawaii/ptaeis/project-home">https://home.army.mil/hawaii/ptaeis/project-home</a> .
Michael Jones		Document 5 is curious; I requested it because I wasn't sure it was the same document I found online by a search for "Waikii Ranch Homeowners' Association." The document (USARHAW, undated) describes various aspects of training on state-leased lands at PTA. It is cited several times in section 2.1.2 and much of the text in this section is similar to that in this document. It is remarkable that this document is undated and there is no indication who wrote it. The section on Ammunition Management has a paragraph on Ammunition Holding Areas (AHA). The last sentence states, "There is one holding areas built on leased land, but two AHAs have safety arcs over leaded land (1,2,3)." Presumably "leaded" should have been "leased." It is unclear if (1,2,3) refers to training areas 1, 2, and 3. The document (USARHAW, 2021) is cited on page 2-5 for the statement, "Approximately 91% of the FPs on PTA are on State-owned land." This document contains four emails in which the sender and recipient are redacted. The most detailed, dated 7 Jan. 2021, follows: Overflowing you data. BLUF-107ea on State Lease Land 90.7% of all FP. To have meaningful public involvement the Army should provide access to requested documents and/or extend the 7 June deadline to submit comments. Explanations should be given for those not provided or redacted.	To the extent feasible, current on-line URL links are provided in Chapter 6 (Reference List) following the reference citation. The USAG-HI website for current publicly releasable documents is: <a href="https://home.army.mil/hawaii/ptaeis/project-home">https://home.army.mil/hawaii/ptaeis/project-home</a> .

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Michael Jones		<p>comments on the Pohakuloa Training Area (PTA) draft EIS submitted by email to : ATLR-PTA-EIS@G70.DESIGN on 7 June 2022 by Michael Jones</p> <p>These comments supplement those I submitted by email on 18 May 2022.</p> <p>I had tried to access material which had links at URL <a href="https://home.army.mil/pohakuloa/index.php/my-fort/du">https://home.army.mil/pohakuloa/index.php/my-fort/du</a> Several of these links didn't work. I reported this by email on 4 June to <a href="mailto:usarmy.hawaii.web@mail.mil">usarmy.hawaii.web@mail.mil</a>.</p> <p>On 7 June I was informed by email from the Army Public Affairs Office that the URL I had used was now being redirected to <a href="https://home.army.mil/hawaii/index.php/du">https://home.army.mil/hawaii/index.php/du</a></p> <p>This URL has a box labeled Reports which contains many reports about depleted uranium. One of the reports labeled PTA Flyover Tech Report Final (July 24, 2009) is one I found online but is not cited in the draft EIS. Other more recent reports should also be reviewed in the final EIS.</p>	<p>Section 3.5.4.12 clarified to indicate surveys found no indication of depleted uranium-containing materials on the State-owned land.</p>
Michael Jones		<p>31 May 2022</p> <p>comments on the Pohakuloa Training Area (PTA) draft EIS submitted by mail to : ATLR PTA EIS Comments P.O. Box 3444 Honolulu, HI 96801—3444</p> <p>These comments supplement those I submitted by email on 18 May 2022. They include one page of text and three figures.</p> <p>The figures show the locations of the ranges used for Davy Crockett tests and should be included in the PTA final EIS. Figures 2-2 and 3-1 come from a report titled PTA Aerial Surveys Technical Memorandum by Cabrera Services dated 24 July 2009 and available at <a href="https://www.nrc.gov/docs/ML0929/ML092950352.pdf">https://www.nrc.gov/docs/ML0929/ML092950352.pdf</a> They show the locations of the Davy Crockett ranges identified as DC area 1 (range 17) and ranges 13, 11T, and 10. None of the maps in the PTA draft EIS identify these ranges. Figure 4-3 is from a report by Cabrera Services dated April 2008 titled Technical Memorandum Depleted Uranium Scoping Investigations at Makua, Schofield, and PTA and available at <a href="https://www.nrc.gov/docs/ML0911/ML091170322.pdf">https://www.nrc.gov/docs/ML0911/ML091170322.pdf</a></p> <p>The upper left image in Fig. 4-3 shows Davy Crockett ranges with piston locations and the location of the spotter round found at PTA. There are other useful figures in this report which should be included in the PTA final EIS.</p> <p>I am submitting printed versions of the figures because I am not certain what format is acceptable. The printed versions are not well-focused and have a red tint; improved versions should be included in the final EIS along with a complete analysis of the impacts of depleted uranium from the Davy Crockett tests.</p> <p>Michael Jones</p>	<p>The State-owned land only contains a portion of a firing location for one of the four Davy Crockett ranges. Section 3.5.4.12 identifies this firing location as being Range 13 on Training Area 9, which is visible on Figure 1-3. Figures for former Davy Crockett firing locations and impact locations not on the State-owned land are not necessary.</p>
Izzy Ka		<p>The military has taken advantage of original agreements with the state of Hawaii, used the land and resources without care for decades, and has proven themselves an incompetent steward of the 'aina.</p> <p>It is well past time for access to be denied to the US Military and the land to be returned to the control and stewardship of Hawaiians.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Iokepa Kaeo		<p>On behalf of the Beneficiary Trust Council and the heirs of Moku O Keawe and the family members that can't make it here. So when we went through your guy's communication. Ha. So back in 2020, you guys already have found that DLNR and the Army has breached its contract to the malama aina case, that you guys obviously couldn't malama aina. And so we see that history of repeating, repeated -- I guess you can call it desecration, because when we look at Pohakuloa and what you guys have done with depleted uranium, you guy have failed to clean up Pu'u Kapu with the unexploded ordinance. You guys have even done so many things to Red Hill. And it's the same, it's the same chambers of Hawai'i that vouches for the people who pollute our water and poison our people. And so you guy's first person to speak, those are the people that we want to expose first is you guys here of defense where you guys send these bodies of organizations forward to speak on behalf. I'm surprised Kai Kahele is not here or the Inouyes or the other people that pump you guys up, all the people that send you guys to rah-rah, send you guys in to hear us how good you guys are. Mitch Roth. Nobody is here. I don't see nobody is here. And that's what shocks me. You guys are going to come here after you guys do to Kaho'olawe. You guys set them up, don't clean it up. You guys have them reorganize themselves. You guy's cultural monitors for Pohakuloa, where are they? We want to see all of these people that you guys are partnering with that's allowing this. RIMPAC is on top of our list. The biggest aquifer, RIMPAC.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Iokepa Kaeo		<p>You guys are bringing how many nations here to sustain a war on humanity? That's not what we do over here. We're not here to pillage other nations. We're not here for drugs and oils and all those other good stuff that America loves. We don't want to be a part of that war. And that lease that you guys want to extend, no, we're taking no action. You guys should not retain no state-owned stolen lands that belong to the heirs, and you guys are not going to have any no more renewal on any other Red Hill, Makua Valley, or any other further Army training facilities that you guys think you guys need for war against humanity. And so with that being said, we would like you guys to cancel the leases, whatever you guys got thinking going on. We don't want no more depleted uranium. We don't want no more different organizations coming up here and speaking on behalf of the heirs. If you guys want to talk to the heirs, I think you guys should have another forum. Because if you guys are going to try and drown us out with nonprofits, with all these university aspects, I think that's what we want. We want respect and we want the right people at the table to express the illegal occupation and what's been plaguing us. So no further leases, extensions on Pohakuloa or any other lands on the Kingdom of Hawai'i.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Iokeda Kaeo		<p>Iokeda Kaeo on behalf of the heirs of Moku O Keawe. And tonight, just like last night, we had to come through. I was expecting to see Kai Kahele, Inouye, maybe Suzanne Case, since she's part of the DLNR, you know, Ira, who has DHHL, all of these partners that are surrounding your PTA. They should be here. They should be here front and center, but they are not here again. So that just goes to show me how serious that this conversation is. It really isn't.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Iokeda Kaeo		<p>We cannot extend the lease no more?. You guys cannot get no more dollar burgers. We don't even get dollar deals. We don't even get a dollar a year, and you guys want to renegotiate and go down this whole circus over it. So today we come, and we just continue to say that these leases cannot be extended. I have to respect one of the authors that came down today to talk about the federal laws. The United States has violated how many treaties? This is an illegal occupation, and so when people say we're going to fight for our rights, there is a difference from protecting and being terrorists. You can go all over the world and be at every state to try and police people. That's a sickness. We're not going to go and follow what they have been doing for the last 60, hundred years of this war, war, war. That's not what we're going to do for our generation, and we are not going to allow all of these older politics, who are pumping you guys up, telling you if guys can get the dollar in your burger. You guys can't get it no more. The leases is up, and everything must be returned, and we know you guys cannot clean up the depleted uranium. So you guys have got a long mountain ahead of you guys, but before you guys leave, you guys have got to clean up. We would like to see that vision come true before any other leases can be even given out. Red Hill, the Chambers of Commerce is telling everybody to continue to drink the water, while the water was contaminated. You guys sent down the Navy head, and he had the arrogance to tell us that you guys can trump us any day of the week, because you guys got the power and guns. I think it's a new era. I think war is not the way. So you guy have to de-occupy and de-militarize the Pacific. Mahalo.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Maxine Kahalelio		<p>My name. My name is Maxine Kahalelio, K-A-H-A-U-L-E-L-I-O. That means the man that fell off the horse. That's what my name is. You know, you guys talk about Kaho'olawe. The name is Kohemalamalama'okanaloa. That's Kaho'olawe. You are not supposed to put Kaho'olawe. That's westernized. Kohemalamalama'okanaloa. The shining vagina, that's what it. Never be ashamed. When the white man came they changed our names, all our names. I want to tell you folks, I am a warrior. In 1977 I got arrested on Kaho'olawe. I was one of them. I was 38 years old and I went on that island. And as we went we went illegally. Our brothers from Maui gave us the boat to jump off, on Opaki Bay. There was 14 of us. 8 women and 6 kane. was a grandmother already, and I swore that I was going on that island to stop the bombing. And we did. We did. Ea? When I was there -- I know I only get three minutes. When I was there, Bruddah, when I went to the top of Kohemalamalama'okanaloa, we were walking following the goats' trail, because helicopters were watching us, yeah. And what I did, what aunty did is I picked up a handful of bullets. Bullets. You know what I did? Kala mai'ia 'oe. You know what I did to the bullets? And one of my friends said, "Aunty, no pick them up, get radiation." I said, "Screw the radiation. You see these bullets? Each of them, each bullet could represent kupuna health, feeding our children, low income, building homes, building hospitals." And I picked them up and I cried on Kaho'olawe. I did. A bunch of bullets that represent our water, our kalo, our banana, you became them, our birds, all went to what? To destroy the very top of Kaho'olawe, Kohemalamalama'okanaloa. Flat. No more the mauna. Before we went on the island, Bruddah, I climbed an 80 foot cliff. And as we were climbing that cliff to go on the top of that 45 square miles of island, I touched the waterfall that's supposed to have been there, and on my hands touched was nothing. No water. No nothing. This is what war does. This is what the bombs do. This is killing. You know, that's what I cannot see.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Maxine Kahaulelio		<p>We kupunas, 38 of us, got arrested on thw mauna. Three years still in court. And all we did was sit on the road, our road, Hawaiian homestead road and we got arrested. But the Army and the military can bomb and kill people, and they still can walk a line. They won't get arrested, but we did. We did. Kupunas, 38 of us, for standing on the road for desecration of TMT. How is this? What is wrong with our system? What? Do I give you a gun to shoot babies in Ukraine? Would you take it from me if I said go shoot one baby? What would you say, Bruddah? No way or yes? But you know what it is. That's my job. I got to do my job. We got to do ours, right? We got to say stop the leases. No more military. Go home. We want to throw you guys a luau in 2029, the biggest luau you guys want, and then escort you guys out of our island and say mahalo, aloha wau ia 'oe. We love you, but Aloha. Go home. Go home. Stop ruining our land. My land. Where do I go, Bruddah? Where do I go to live if you guys are going to desecrate? Let me tell you something, in 1968 I lost my brother Bobby by friendly motor. My America killed my brother Bobby in Vietnam. How I found that out? Bob Jones. Remember Bob Jones, everybody? He was working for KG&amp;B. He just died. He was interviewing my brother Bobby. Two years later my brother Kenneth died in Vietnam. Machine gunned down by a Vietnam person. They shot my brother with a machine gun until it emptied. My Bruddah. Is this what you guys want? Is this going to continue? God's 10 commandments, thou shall not kill. Why? Why? Answer me this, is this your job to go out and kill somebody else that you don't know? That's what my brother did. He was in the 25th division in Schofield. Two weeks he got in the land. The next day he was killed by American motor. They busted on him. Sergeant Robert S. Andrade. His monument is by the state capital. Go see it for you guys self. My other brother is Kenneth Soares Andrade, Sergeant Andrade from Amarillo, Texas. He was stationed there. Machine gunned down by a Vietnamese. He didn't know my brother, my brother didn't know him, but the pentagon knew. But you think they stopped it? They didn't stop him from killing, because that was his job. Well, you know what? I don't want you guys' job. You need to get another job. You guys do.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Maxine Kahaulelio		<p>Refurnish the Island of Hawaii. Pohakuloa, you know how many Heiaus in there, brother? And you know we got to go in there. We do our ritual, yeah tita, every November, yeah, our thing with the leilani, yeah? Well, we go inside and we pray. We do our ahu. We put everything. The Army like my address, my license plate, this, that. I tell you, well, you like my measurements, too? We no can go inside there, our own land. Our own land to practice, to pray, because the Army said no, you cannot do this. You cannot, no, no, no. You cannot do. You cannot take your. No, no, no, no, no. And only two of us can go in to monitor. Ku Ching and I, Ku Ching is sitting there, we just won the Supreme Court. We just won for have you folks clean up before you guys go out the other way. But you guys are not doing, because why? I tell you why. I tell you why. Because you guys get Ed Case in Congress and get Susan Case in DLNR, which is brother and sister. How that? It's not a conflict of interest? Damn right it is. But who gives a damn? Who gives a damn? Nobody does, because it's Hawaiian land. And Ku said today, I said, Ku, why do you guys hate us so much? Why do you hate me so much? You know what Ku told me? "Because Maxine, you belong to the land." I belong to this land. That's why they hate us, because they want everything that we have, our land, our fishes our ocean, our water, our mauna. What else do folks want? What else? You guys took it all. Fort Ruger, Fort DeRussy, Fort Shafter, Hale Koa Hotel, on our beautiful ocean. Beautiful beaches. You condemn our water. I was a little girl when I knew all these things are happening.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Maxine Kahaulelio		<p>Triple Hospital. You know that Triple Hospital is the Heiau? That's the Heiau, and underneath the hospital is where the tunnels are. They built the tunnels to put that diesel two and a half miles to go to Pearl Harbor, to fill what, our destroyers. Your destroyers. The pentagon destroyers. And what that fish, that was a fish pond. The greatest fish pond that Hawaii ever known. Pearl Harbor fed the Ali'i, fed the commoners, and it's all gone. All gone, because the military owns all our land. But you know what? They no own me. And I said today on TV that if I have to walk in Pohakuloa through the gates I will, Bruddah, and I don't give a damn if you shoot me. I will. And if I'm going to get arrested again, I'm going to do it. I swear to my God, enough. It's enough. Go home. Go home. Leave us alone, for crying out loud. Leave us alone, and let us get back to our land. We don't want your protection, because you cannot protect us. I was four days on Kaho'olawe and you couldn't find us. The Army couldn't find us. Why? Because we were in the caves with the goats. And they have the infra-red, but they forgot the infra-red no can go in the tunnel, only like this. And we was like this with the goats, all stink, but that's okay, because we swore we were going to stop the bombing. And in 1996 The colonel did this. I'm going to show you what the colonel did. In 1996 on Kaho'olawe, here was the water right here. He had one foot on the sand and one foot on the land. He took his cigar and he threw it, and he said, here you damn Hawaiians, take back your land. He threw his cigar on the land. Is that what you guys want to hear? We know, because we were there.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Maxine Kahaulelio		<p>I, Maxine Kahaulelio was a federal prisoner that got arrested in 1977, handcuffed and everything, took to Pearl Harbor, on your ship through the Moloka'i channel two nights, deliberately to make us sick, where they could have put on us a helicopter, take us 45 minutes to Pearl Harbor. But no, they never. They never. So I'm doing this for my two brothers, my two brothers who never came home, because he had United States Army on the same jacket you are wearing, and he's gone. Go home, you guys. Tell your commander and Pentagon that the Hawaiians love you. We love you very much, and God loves you, too. But you guys need to get the hell out of this place. Really. Pack all your artillery, all your firearms, all your rifles and your grenades and everything to kill people. Go home. You can tell Ed Case I said that. You can tell Ed Case and Brian Schatz and all the damn stupid Congress people up there that stop killing you folks. That's my testimony tonight. Mahalo.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Nawahine Kahoopii		<p>My name is Nawahine Kahoopii. N-A-W-A-H-I-N-E, K-A-H-O-O-P-I-I. Thank you for being here. I want to first say that I don't have anything against the military. My father was a Marine. Brother-in-law is Marines. So this isn't personal. But I do say no to a new lease. I really appreciate what -- I think it was you that gave the testimony and spoke about the national importance of our islands to national security. It almost -- it upsets me when our place is viewed that way, that our home where our children and our grandchildren are trying to live and thrive is seen as a place of national security. In 1854, Kamehameha the III declared Hawaii a neutral state for that very reason. We stayed neutral to foreign conflict, and I feel that we need to remain that way for the protection of our people and the protection of our culture. The things that are happening right now, I think is something else that brother brought up about what's happening in terms of chinning up these issues in the South Pacific and China, which specifically makes our moku and our island a target. I have just my first mo'opuna born, and I am really worried about what is happening up at Pohakuloa and what can happen to my family as a result of this kind of conflict being stirred up in the South Pacific.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Nawahine Kahoopii		<p>My other two issues were you talked about the cultural things that you take care of and the aina and you are caring for it, but we have two kupuna here that had to sue to even have that place inspected. It hadn't been inspected, even though that's a contractual agreement, in over 25 years. The other issues that was fought in our community for many, many years was the issue of the depleting uranium. There was finally admission of that, but then there was the insult that it probably wasn't dangerous. How can depleted uranium not be dangerous? Also, that you weren't able to locate exactly where those areas were where the depleted uranium remained in the soil. And then finally, you have 23,000 acres of land, ag land, waters and so forth. We're importing 90 percent of our food. This has been an issue, again, for our people for decades about us becoming at least food sovereign. Now, because of the things that are being ginned up in terms of conflict, not only in European areas but also in the South Pacific, we already have shortages of food. We're going to be facing shortages of energy and so forth. The idea that we would take more of our lands and not be concerned with feeding ourselves first and making sure that we have our own energy issues taken care of is a big issue for me. So this current footing of war, even the president admitting that we were going to be facing food shortages and there is not any offer of a solution to that, again, makes me say, absolutely a'ole to the consideration of 23,000 acres of our lands being taken up when we can't even feed ourselves yet. So thank you.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Sherri-Anne Kamaka		<p>It is unnecessary and not right or pono to use Pōhakuloa for military training. This will have adverse affect to our Island Nation. Please take the training to North America. The state of Hawai'i has special needs for protection of our Islands &amp; indigenous floral &amp; fauna, marine life that are endangered as well as conservation strategies. Furthermore, the military perception and strategies in Hawai'i is out dated. With the increase in awareness when it comes to what humans (military) do to our 'āina, humans (military) needs to cease training activities in Pōhakuloa asap.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Alakai Kapanui		<p>Aloha mai kakou. O Ke'alaka'iokalani Kapanui Kahiamoe ko'u inoa pono Kealakehe Kona Moku'o Keawe. I wasn't going to talk today, but I have listened to enough people, and they have all brought up really good points, my kupuna they have. Desecration of iwi, depleted uranium, lead poisoning, violating our water table. You are poisoning our water. In 75 years none of us will be able to live here. We will all be dead and this place will be uninhabitable because you could not stop bombing. And we're supposed to continue drinking that water. The same thing that happened at Kakee (ph.), it's going to happen here. National security, making us a target. There is a lack of transparency. It wasn't inspected for over 25 years. We know that our iwi are there, we know cultural sites are there, but we don't have access to it because it's dangerous for us to go in because you guys are bombing it. So we are not able to go inspect those places. But it's your kuleana to do so, and you did not do it. And my kupuna had to sue you guys to make that possible. What? Critical habitat. Do we care about our birds? Hawaii is the capital of endangered species and extinct species. How many species of birds should I list off that have under 500 specimens left in the wild? I can name quite a few. Should be working on reforestation instead of pollution. What are the long-term effect? What are the long-term effects of those things? You just going wipe out everything until you cannot? Yeah. You should fulfill your contract, which is to clean it up. I know, because I helped malama Makua Valley over on O'ahu, and they are not able to inhabit Makua Valley anymore. It was seized in the 1940's for World War 2, and they did live aerial bombing there. Nobody will ever be able to farm kalo there ever again because of fear of live unexploded ordnances. You cannot farm there. You cannot dig into the aina without fear of blowing yourself up.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

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Alakai Kapanui		<p>I do actually have one question, if anybody in this room knows the answer. Who is the cultural practitioner that helped to draft this EIS? Does anybody know? Because I don't, and it's not listed. Who is your source, nana i ke kumu. Who are you referencing? There is cultural significance of Pohakuloa. It connects up to Pu'upohaku, Pohakuloa Gulch that runs all the way down Mauna Kea. The water that is accumulated in Pu'upohaku drains into Pohakuloa Gulch and then into Pohakuloa, so we know that the wai is there. You know, and mostly this is about our ability as kanaka'o'iwi to continue living on this land. And I am Diaspora. I grew up in Seattle. I didn't grow up connected to this place. But my ohana is and always has been from here, Moku o keawe. And now that I am back, my family will continue to be from here, and nothing will ever separate us unless you make it impossible for us to live here. And we will all be dead, because of your inability to back away and say, okay. Pau.</p>	<p>Section 3.4.4.4 of the EIS and Sections 5.0 and 6.0 of the CIA have been revised to reflect additional information provided by interviewees who responded to a second request for input in December, 2022, following the height of the COVID-19 pandemic.</p>
Alakai Kapanui		<p>It's not so much a statement or anything. It's more something for you guys to consider, because in your clause -- there is a clause in the land agreement that you have to restore the land back to its original state, and I want to know how you guys intend to do that. And I know you don't have an answer, because I also know that it's not possible. So in your pursuit of renewal of your lease or extension of your lease I would like you to consider how much more damage is going to be done on Pohakuloa than has already been done. Okay? How you going to put the rocks back? How you going to restore the Heiau. Are you going to do all the ole, all the protocol to put our kupuna back to sleep? Do you know them? Because I don't even know them. I'd be impressed if you did. Would you like me to continue? Of all the restoration that's going to need to be done. Reforestation. Like, it's just something to consider. Mahalo.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
NO Kapaole		<p>Nana lau nani kapa'ole. Aue, aue, aue oia ho'i ka u'i olelo Hawai'i ma keia. I would start with Aloha, but you guys took that for granted already. Right? Of course, we have Aloha for all of our relations here, our ohana, for this beautiful kino lau here. But to have Aloha for the rapists, to have Aloha for the people who continue to ignore us, to marginalize us, to bomb our aina, to disrespect our people, our voices, our indigenous systems, our water, aue, aue, aue. We're here at UH. Maybe you should learn a couple Hawaiian language words while you are here, because a'ole seems to be a hard one for you guys to get. When we say a'ole, no more leases. No leases. We never said aye. We never said ae. So to ask us for one, two or three, no, no, no, no. A'ole means no. We've already said it. So the redundancy is why I say aue, aue, aue. What else can we learn while we're here? Oh, malama aina, that's a good one. Some doctors in this building they might be able to teach you a little bit about what that means. Malama aina. Yeah, the Supreme Court, they said you guys didn't do it. We already know. We can tell. They didn't pass the ae test, yeah. But malama aina, to care for the land. To care for that which feeds. To keep it in perpetuity so we may always be fed and feed each other. The aina. Malama aina. Shine them up. Make them nice. Make them good. Make them 'ono? Don't destroy it. Don't sabotage it. Don't corrupt it. Don't take it for granted. That's not malama. Shine them up. Make them nice. Take care. Make them 'ono. Malama aina. That's what we need. Yeah. That's supposed to be your Kuleana, supposedly. We know that's not your Kuleana either.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

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NO Kapaole		<p>We have Hawaiian kingdom crown and government heirs of this aina. Still yet, you never kill them all off. We're still here. Portions of us still breathing, right? Kuleana, to take care of the aina. We can all do that. No matter what uniform we wearing, no matter what T-shirt we trying to say. But that's not what we're here to discuss, right? Business as usual. That's pretty much what's on the agenda. So we do not consent. A'ole, a'ole, a'ole a mau loa aku, ea o kou Hawaii'i pae'aina keia. This is the Kingdom of the Hawaiian islands. You have worn out your welcome a little bit with the bombs and with the ignorance and with the compromising of critical natural resources. You know all the human rights violations. You know all the crimes against the environment. Really, because we share. We share. But you no malama aina. So before we leave, we got to all learn maybe how to put this in a sentence. A'ole mako, malama aina. That's something you guys should learn how to say. Because all these other words in here don't really mean nothing. It just means you are going to continue to rape, to pillage, to sabotage, to destroy, to smoke screen, to propagandize, to put a couple keni kenis out there for the chambers of secrets, and all the other slithers around. Ela ka, ela ho'i makou. We're here. We're going to continue to be here, and we're going to continue to bring our ohana forward, to hold this space, to hold this line. Aloha aina, malama aina, malama Kuleana. Call upon the community to do those things, not to continue with the bullshit. Ka'olua. We don't have a word for that in Hawaiian. The DBs came after. But ke 'olu'olu and malama and Kuleana, and that means -- I don't think it means stay here, continue to do what you're doing. Help us transition. Help us take care of the remaining resources we have to share with you.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Mariah Karson		<p>Let the lease lapse and give the land back to native Hawaiian people. I push for your "option 4" no-action alternative (under which the lease lapses and the Army loses access to the land). End forced colonization of land across the globe.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Kawaipio Kauahi		<p>As a Kanaka Maoli of this land I do not agree to allow the continued destruction of Pōhaukloa by the army/military. Dozens of dead 'ōhi'a and other native plants, destroyed during a 2018 fire caused by military negligence -- which is all too commonplace in this delicate ecosystem. This fire burned over 1,000 acres within critical plant habitat in Training Areas 18 and 22, which both fall within the state-leased lands. The army is the single largest threat to the Pōhaukloa region, which houses numerous endemic, indigenous, and endangered plant and animal species. This 'āina has been treated as wasteland for far too long; the native wildlife here deserve better. Kānaka 'Oiwi deserve better. Our kūpuna and keiki deserve better. Despite the destruction, I have faith in the resilience of this land like the anunu vine (Sicyos spp.), rising from the ashes, but rebirth can only happen with the removal of these lands from the army/military.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Kamahana Kealoha		<p>Cease, desist all activity and leave Pohakuloa. I am firmly, without hesitation against the continued military use of Pohakuloa. I demand you cease and desist all activity and leave. Your time is up. The lease has been violated multiple times.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Louisa Keawe		<p>There is a fine line to know or not to know where it is or is not permissible to uses our Hawaii lands for your training. We need to be very close in communicating about these issues: especially with the locations. I hereby at this time OPPOSE for the uses of Hawaii, Pohakuloa to be used for training at this s time. I believe there is a site and it be best to discuss it further and check with our Kupuna to help in this findings of land for your training to keep it PONO. Sincerely Ms Louisa Keawe</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
James Kelley		<p>Please end military training and operations at Pohakuloa. This could be an incredible turning point towards conservation and to protect the wildlife that struggles to survive in such a unique environment. Many of the plants and animals are found nowhere else on earth. What an incredible pivot that would be!</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

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Commenter	Submitted By	Comment	Response
Sharon Kershner		23,000 square miles is 10% of the Island of Hawaii and 5% of the entire state of Hawaii. What other state GIVES the military so much? You use the power of a conquering nation to oppress, use, and abuse the land and people. Take take take. ENOUGH ALREADY. GO SOMEWHERE ELSE. The fragile Island land and her people have had enough.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Hawaiian Kingdom		From: Hawaiian Kingdom World Court Provide ur bonafide Land deed. Bonifide minister to Minerals Rights Claim Filed "Bureau of Conveyances" 5-17-22 State of Hawaii (ownes) NO LAND !! = A corporation subsidy of United State's Corporation owes NO LAND IN HAWAII = territory = Hawaii Mornarch Constitution "all land kepted in perpetually (forever) for heirs & sucesors. Fraud n theft to claim to own another Persons Property. To: Mr. Michael Donnely All will be held accountable: All DEFECTIVE contrats after 1959 Evidence for world courts: U.S code violations: INTERNATIONAL LAW. Proper - ?Provide your DEED (ceded of Annex Stolen Land cannot) Geneological land claim - STATE & FED Gov't ownes no land State of HI foreign US citizen voted do not own land. Transfer by unauthorized BODIES. Govt coporation w/o "STATE Owned Land" Public Notice Star Advertizer Repedely Publicizes FALSE & INACCURATE Information – Propoganda: Fraudulent land claim State of Hawaii subsiday = Registered "1959 District of Columbia Foreign Corporation." A corporation registered in the U.S. Territory (met & Bounds) Lat – Long Jurisdiction 12 mile off U.S. mainland State of HI ownes no Land in Hawaii. There is no Bonifide Land Deed: · Only leases of LESS THAN LEASE ·	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Hawaiian Kingdom		All Land (jes soil) in Territory Allodial Title registered with Mathew Hoopili – Hawaiian Kingdom Minester. Probate trust perpetual Land title . Bonefide and recorded in the Bureau of Conveyance and title guaranteed. All rights & athourity belong to heir & successor with vessel & seal of Bonifide land trust. Pure Jurisdiction All other Land claims & contracts are by STATE Agents & Officers of a corporation are Defective. Not pure or Bonifide All Authourity are needed by Bonifide sovereign Right & Jurisdiction of mineral rights (12 miles ocean, air, land). Pay for managed use of land (LUC LCA Rein) not by a SR All contract after Jan 17 – 1893 are defective & fraudulent = propaganda treason acts of In the H Arch Territory Jursdiction (Treason – war crime) will be addressed in Internation (Law of Nations) world * All crimes by State & Federal courts – Agents of the Federal govt & state – land ommisionors will be held accountable. (For these crimes) (systematic corruption) Corporations cannot own land (mineral rights) in "IT Zone" Hawaii's Jurisdiction. Alodial title. State of HI corporation District of Columbia – Are in violation of all U.S. FEDERAL codes. U.S. code art 28, Sect 3002 – Line 15 ext. Treaty of Peace & friendship ALL ITZ commerc laws violated All Foreign Illegal U.S. Citizenship (National Voters) The Director: Public Affairs State of HI Department of Defense, Maj (RET) Jeff Hickman at (808) 441-7000 To: Mr Michael Donnely (PTA) * Need to clean up Pohakaloa: Contract Defective . Bonifide Indegenous National (All Rights reserved) Perpetual Land title trust & Heir & Succ Geneological land ties only.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Micah Kupahu		The American military should have never been allowed to come here and for sure should not be allowed to stay the damage they have done to these islands and continue to do can not keep happening and the lack of respect and care they hav shown should be exhibit 1,2,3 for why they should be banned from doing any operations in hawaii unless asked or authorized by native Hawaiians and all not just one group	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Sunnie Kupahu		Stop the bombing on pohakuloa. It's been happening since world war 2. Like the bombing of Kahoolawe. We don't need anymore distruction. Your doing more harm to my hawaiian people and to the aina. Mentally it is so wrong. so much harm because you are harming our islands and the water, our people, our native plants and native animals. Stop the bombing and return it to its natural state.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.

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Commenter	Submitted By	Comment	Response
Raiatea Oliver		Why is America still bombing in Hawaii? have you not learned from bikini atoll? Or when all the land is bought up you guys going put us kanaka on the destroyed land and let us die off faster?? Stop bombing any where in Hawaii!!! America is huge go bomb on the mainland!!!!	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Jessica Kuzmier		Aloha, I am submitting my perspective regarding Pōhakuloa Training Area. My belief is that the 'no alternative' option pertaining to military training is the best option at this time.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Jessica Kuzmier		<p>I believe that the government land would be better served to be turned back to the state so that energy alternatives such as solar arrays and other renewables can be mass-produced so as to assist the state in becoming net-emissions negative.</p> <p>I believe if the military does hold onto any land, that the choice to invest in methods to help reduce and monitor climate change would be a better alternative. One option is to sublet the land to the US Army Corps of Engineers to develop better technologies to mitigate rising sea levels and other effects of climate change , as well as bolstering infrastructure to Hawaii's coastlines and other areas that will be affected by this. I believe this is a better choice and use for the military's time and investment if they hold onto governmental land.</p> <p>There are of course many threats to our safety from international threats and domestic terrorism, but the threat of climate change has been woefully neglected in the face of these more immediate and seemingly more pressing concerns. But in the end, climate change is an effect that will be just as dangerous as any attacks from people. And in fact, climate change will likely be the root of many incursions due to crop failure, famine, flooding and other displacement realities for populaces worldwide.</p> <p>Addressing climate change through the investment of renewables is as much a defensive military strategy as any military exercises and combat training, especially as military threats are just as likely to be cyberattacks on grids and infrastructure as traditional theaters of war.</p>	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Elizabeth Laliberte		My name is Liz Laliberte and I am a resident of Hilo, Hawaii. I say NO to PTA's request to renew the lease on 23,000 acres. Why NO? Because PTA has been a bad lessee. First off, the toxics. If you owned a property and your lessee poisoned the land and air with toxic chemicals, would you renew the lease? And if you requested an accounting of what chemicals, when and how much was dispersed, they said they couldn't tell you? No way would anyone in their right mind say, "Sure, keep up the good work for another 50 years." To add to this, PTA is a bad neighbor. They are noisy, dirty and a danger to surrounding ecosystems and communities. Their helicopters have started wildfires, their planes fly overhead at all hours of the day and night and disturb the peace of our communities, and their convoys are jam up the roads. Multiple times have I seen military trucks pulling off the highway (dangerous) because of smoking brakes and burning clutches. This is a hazard to residents. Last of all the damage to the ecosystem cannot be understated. This lessee destroys the land and and the animals that depend on it. Their footprint grows bigger by the year. Birds, insects and plants that are found nowhere else in the world are burned, bombed and generally terrorized by the explosions. PTA is like a house of bad renters that you can't wait to evict because their loud parties day and night, dogs roaming around and pooping by your mailbox and garbage piling up all around. Meanwhile you are paying thousands of dollars a month for the mortgage and they pay NOTHING! You hope and pray one day they will leave even though you know it will be a big expensive mess to clean up.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.

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Elizabeth Laliberte		<p>PTA IS this bad neighbor, this bad lessee that must be evicted because they bring ruin to the community. They may claim it's "critical to national security" or "an important geostrategical installation" or even that it brings jobs to the island. But at the end of the day, most service men and women stationed there are not from Hawaii, and the "national security" argument is as old and tired as your grandpa after Thanksgiving dinner. The DOD conveniently trots that one out when there's no other good reason, like when a parent tells their kid, "because I'm the parent, that's why." Last of all the DOD may fearmonger about the "threat rising in the east", meaning China, and claim that Hawaii's proximity to the Asian continent makes Hawaii's bases critical. to this, we have noticed over the years that the DOD will constantly manufacture a foreign boogeyman or enemy in order to justify its existence. Terrorism, Communism, Autocratic Regimes, the list goes on. This is shameful scaremongering. Meanwhile, China does not threaten the existence of life on this planet. The real scare is that DOD is actually killing the biosphere by escalating global warming because it's the largest single emitter of CO2 and user of fossil fuels. The more land and areas they control, the more fossil fuels they burn and make it less likely we can salvage a habitable planet. Does it make sense to give them a green light to continue this destructive behavior? Out of self-respect and self-preservation, our community needs to say NO to extending the PTA lease. 'Aole PTA! Give our lands back!</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Nani Lanai		<p>Hi, If this is a real estate action, the army must pay a reasonable price for the lease of the land. A 1\$ a year lease is an insult considering real estate costs in Hawaii. This doesn't even cover the cultural aspect. I'm opposed if the military cannot pay more than 1\$ a year for a lease. With these insufficient funds they will not be able to maintain the land properly.</p>	<p>Thank you for your correspondence. Your comment has been noted.</p>
Hunter Lange		<p>Listen to Kanaka Maoli and their wishes to protect sacred lands. Leave Pōhakuloa alone and prevent the further desecration. Kanaka Maoli are the ancestral stewards of the land and you're not only posing a threat to their 'āina, but their connection to their kupuna and their piko. This is about preservation of life on earth. Listen to Kanaka Maoli.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Lelaine Lau		<p>"PTA provides a quality joint/combined arms facility that provides logistics, public works, airfield support, and environmental and cultural stewardship in support of the USARPAC training strategy, while maintaining an enduring partnership with the Hawai'i Island community."  Honestly, I don't have time to read 400 pages, but let's start with this mission statement. The military cannot with a straight face, claim any kind of environmental or cultural stewardship on ANY land they are on in Hawai'i. This is borne out by facts. No one believes this to be true. In fact, your own troops that you are poisoning via Red Hill don't believe it to be true. They know you have lied to them and do not care about them.  Cultural stewardship? Is that your word for bombing? Has not the military already desecrated enough of this land via bombing? And on Kaho'olawe which was never cleaned up? why should anyone trust your word when you have been nothing but disrespectful to the Kanaka Maoli since the day you provided cover for the illegal overthrow?  It is a fact that one thing the military is unparalleled at is in creating superfund sites. So please, let's dispense with the lies.  Further, that "enduring partnership" is actually imperialism and occupation.  Nice try with the euphemisms and lies. I expect the other pages are filled with the same.  DEOCCUPY HAWAI'!!!</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

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Commenter	Submitted By	Comment	Response
Kawena Lauriano		I write today in STRONG opposition to the lease renewal of Pohakuloa Training Area. The US military continues to destroy and pollute the land of Hawai'i with little to no regard for the land or its people. The time has come to stop the desecration and pollution. Please do not renew the lease.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Jonathan Lee		I do not support the Army's proposal to retain this land. The Army should immediately return this land to the State of Hawaii to make room for a new highway to the west side, housing, agricultural land, and other much needed land uses. This land is not needed for national security reasons and the Army is not being forthcoming about that. There are other states o the mainland that would be more than adequate and more than happy to provide training grounds for Army personnel and there is absolutely no reason for the Army to be on this tiny island. It is a waste of money to train soldiers here, it is a waste of space when more space is available elsewhere, it is a waste of money to transport soldiers, their families, and their home goods to live here to train. The price to transport the equipment to train is also rising. It is a win-win to relocate this training facility elsewhere and it is the decent, dignified thing to do. The land belongs to the people of Hawaii and this particular training ground is especially excessive for them to hold on to.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Selah Levine		I do not agree with retaining the pohakula training area for military use. It is detrimental to the fragile ecosystem and cultural sacredness of that area. There is too much military training on Hawaii period.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Ralph LeVitt		As a resident on the Big Island of Hawaii, I welcome the military's use of the Pohakuloa Training Area to keep our soldiers up to date in their training, through both live fire and simulated weaponry. The entire area is pretty much unusable lava fields that can serve no other purpose. I have no problem at all with it's current and hopefully, future use for training.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Trinity Medler		The military needs to stay off Indigenous land and respect the wishes of the people trying to protect it.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Danny Li		My name is Danny Li, D-A-N-N-Y, L-I. I live in Kea'au. My testimony is that I do not support. I advocate no lease renewal. Cancel the lease. And my testimony is pretty short today. Two lessons of A, B, C, make it as simple as possible. A, B, C (indicating). A, aina, yes. B, bombs, no. C, cleanup, yes. Now I will let that sink in for about a minute, and then I will have one more minute of another lesson of ABC. (Moment of silence.) Okay. My second lesson is also A, B, C. I was actually in the ROTC. In fact, a lot longer than probably most of you here. '66 to '68. But those were three lessons I was never -- that I was never taught at ROTC. Lesson A, the United States was established in 1776. So it's about 246 years since then. Of those 246 years, only ten years the United States has not been involved in a war with a foreign country. I challenge any one of you to name another country that is more violent-like. Look it up, please. That's something I did not learn from ROTC. Lesson number two, B, lesson B -- again, I was not taught this. Martin Luther King he was supposedly honored by everybody, right? But they are very selective. They never wanted to say what he actually said before he was killed. Okay? He was assassinated, obviously, in 19, I believe, 64. But months before that, because of the Vietnam war, he made that statement. "The U.S. government is the greatest purveyor of violence in the world today." Now, that was before -- that was during Vietnam, before Iraq, before Afghanistan. I didn't learn that from ROTC. Lesson three, C, again, I didn't learn from ROTC. In 1893, the U.S. military helped overthrow an independent government, right here in Hawai'i. Okay? And now you are asking the people of Hawai'i to renew the lease so that you can train to do the same kind of regime change all over the world? No. Cancel the lease. Mahalo.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.

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Commenter	Submitted By	Comment	Response
Danny Li		<p>The entire 133,000-acre Pohakuloa Training(PTA) was wrongfully seized--first by an Executive Order and later via an additional State of Hawaii lease--from the Hawaiian people. In the past seven decades using the entire PTA as training, the US Army has irresponsibly despoiled the land and water without a thorough Cleanup. This is absolutely inadmissible. The US government needs to fully fund an independent investigation into all the toxic waste dumped at the PTA site. And then fully fund a complete cleanup, so the entire 133,000 acres can be safely returned to the Hawaiian people, for purposeful use to improve the people's public welfare. This should be the only course of action allowable to the Army. Returning sovereignty of PTA to the Hawaiian people would mean no more war preparation is ever allowed on these sacred lands. The entire civilized and progressive world community is anxiously awaiting this historic day!</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Howard Ling		<p>I am a farmer dedicated to the movement of reestablishing food security on the island of Hawai'i. I get it, with everything that I do as a farmer, practice makes perfect. Practice allows me to find efficiencies, practice helps me to continuously improve my abilities to produce food. As such, when it comes to national defense, I agree, our soldiers need practice in order to be ready to protect our country. I understand that this draft EIS is addressing a real estate transaction between the continued lease by the federal government of Hawai'i State land. This land, which has been filled with firing points to allow deployment of live fire munitions onto our US soil. The environmental impacts from live fire training is actually on government owned land. I urge you to consider the same wisdom shared with us by our national park services, pack in and pack out what you bring to this land. Can we leave this land the same, if not in better shape for our future generations to come? What will it take to clean up? Are we able to curb live fire training to be able to meet our abilities to clean up the waste in which we create? What is the efficacy of our current live fire training? How much more can we rely on the existing Battle Area Complex's digital live fire range to simulate live fire, thus helping to reduce environmental impacts? I believe in a win win scenario, and hope that this lease renewal can be a starting point to examining the status quo and determining how we can continue to achieve military readiness and still leave a world safe and ready to pass on to the generations to come.</p>	<p>Thank you for sharing your concerns. The Army's cleanup efforts after training exercises are discussed in Section 3.5.4.11. Text revised to state Army removes or deactivates all live and blank ammunition upon completion of a training exercise in compliance with the lease and removes solid waste prior to departing a training area or range facility in accordance with the U.S. Army Garrison, Pohakuloa (USAG-PTA) External Standard Operating Procedures (2018).</p> <p>In accordance with the lease, and under the provisions of existing law, the Army retains responsibility for cleanup and restoration of former training areas. After the lease expires, the Army will follow Army regulations to determine how and when the cleanup and restoration will occur, following the CERCLA process.</p>
MeleLani Llanes		<p>I am writing in response to the Draft EIS regarding the lease of land where the Pōhakuloa Training Area (PTA) is located on the island of Hawai'i. I am stating without hesitation that the lease needs to end in 2029, the end of the current lease term.</p> <p>The Department of the Army has shown incredible disrespect for the land and the indigenous people's of Hawai'i, starting with the lease amount of \$1.00. Add to that the desecration of land and natural resources at Pōhakuloa and the environmental mess you've left in your wake! Then there is the trauma experienced by residents from having to endure the rumble of live-fire training. There are plenty of places to do your training on the continental U.S. The outrageous amount of land resources that the DoD is in possession of in Hawai'i is unconscionable.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
MeleLani Llanes		<p>The DoD has demonstrated time and time again that they are incapable of caring for the land, which is a requirement of the lease, and as their leases expire, they need to go elsewhere and return the land to the residents of Hawai'i, especially Native Hawaiians. Reducing the military presence in Hawai'i by 80% could still maintain U.S. national security. It's time for you to reduce your presence there and move elsewhere. Or better yet, focus on peaceful practices, not military ones. While I am obviously upset with this issue, I still pray for those in military service and their families, especially those we have lost.</p> <p>Mahalo for the opportunity to express my feelings about this issue</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Paul Lonokapu		This is a "no brainer", Option 4, no new lease! Reason why is simple... The United States of America military needs to DE-OCCUPY the HAWAIIAN KINGDOM of its belligerent military occupation and fulfill its obligations to restore authority back to the HAWAIIAN KINGDOM. And although this is the main reason from a legal standpoint of both US law and International law as well as Hawaiian law, there are other more urgent and crucial issues why PTA needs to be SHUT DOWN. Depleted uranium, unexploded ordinance, contamination of our water, air, and land pose a serious health threat to us and future generations. PTAs locality is mauka as well as central of pretty much the rest of the island and the majority of its population. Shit flows downhill. Look at Red Hill. Like I said... it's a no brainer.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Paul Lonokapu		There are more cons than pros to PTA. A few cons right off the top of my head other than the ones already mentioned, PTA, Pearl Harbor, KMCAS, Skofield Barricks, etc., puts Hawaii at risk of attack from enemies of America. Live fire exercises desecrates and destroys important historical, cultural and sacred places, (war crimes), State of Hawaii has no legal right to lease out these lands to begin with, it is an illegal entity derived from a resolution of United States Congress, which has no authority outside of US territorial boundaries, PTAs presence denies access to natural resources in the area and prevents us from performing our God given rights to gather these resources. These are just a few reasons and are just the tip of an iceberg. As far as pros... I honestly can't think of one good reason why PTA should be here, let alone remain here any longer.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Paul Lonokapu		Instead of trying to renew the lease, PTA should be cleaning up all of its "opala", unexploded as well as exploded ordinance and plan on vacating the area. This is an island. We have only X amount of area here. It was a stupid idea and a mistake to allow PTA to even exist here for all these years. Stop the stupidity already and go back to America and train over there. Do your live fire exercises and blow up your own grandparents gravesites. Go back and desecrate George Washington and Benjamin Franklin historical sites. What America has done here to Hawaiians and to Hawaii is so typically American. You've heard the saying "Hawaiian by birth, American by force". I am a proud Kanaka! I could never be a proud American. America makes these lists of certain plants and animals which are deemed "endangered" and put strict restrictions and heavy fines if an endangered species is harmed in any way. What about the Hawaiian? Don't you think the Hawaiian is an endangered species? What have you done to protect them, their habitat, their land, their culture? Nothing! In fact you've been trying to genocide us. And then there's the list of invasive species. You have miconia, coqui frogs, mongoose, fire ants, etc., but the biggest most invasive species is... the American. DE-OCCUPY HAWAII. Go home. GTF!	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Joy Loo		How you treat the land, is how you treat the people. I am strongly opposed to the US military's use of Pōhakuloa in any way. I say NO to the lease renewal for an entity that has proven they have no respect of our lands, releasing toxins in the live fire training, with no regard for people, animals, & plant life. I say clean up the mess you made, US military, & stop your desecration. I wholly support the demilitarization & deoccupation of Pōhakuloa. Immediately.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Olivia Louis-Charles		Using this land for military purposes has significant and damaging impact on the land and environment, which includes rare native species of Hawai'i	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Bella Lynch		<p>Aloha, as kama'āina i believe it is my kuleana to defend this sacred space of our home. The military should not retain this land area, at pohakuloa. This is one of the few areas left in the state that hasn't been completely ravaged or desecrated by the United States occupation or impacted severely by the colonization of Hawaii. I believe the military should see it as their duty to protect and preserve what is left of the aina, both physically and environmentally. The US military already has a history of exploiting Hawaii for its resources, and destroying land for their own use without consideration of the people of the land, or the land itself, one such example is the bombing of Kaho'olawe. Please use this instance as an opportunity to make some sort of amendment for the suffering and harm that has been caused, and work with the people of this land in an expression of aloha, instead of hurting us further. Mahalo nui loa for your consideration.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Julia Macri		<p>I choose the Eis option 4, the no action alternative, to not renew the lease for pta. Mahalo for your consideration for my comment.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Mahealani		<p>My name is Mahealani, but my name doesn't matter at this point. What matters is I went around and I read the posters back there, and yes, you do need training to go out and defend whatever war you attain to, but the bottom line is we need three sources to survive: Air, water, and land. And by doing this up there, you are training with live ammunitions, it contaminates every source of this, our air, our water, our land. Our land is being contaminated. It goes into our water system. I believe you have enough training areas. Go back to Area 51 in Nevada. You have Schofield Barracks. You have Wheeler. You have Bellows Air Force Station, which is on Hawaii homeland. You have Kauai, land on Kauai, Barking Sands. And here are the Hawaiians, without their land and without their aina to be sustainable. For years many men have battled and women and children to get Kaho'olawe back. I had family evicted from Mokauea in the Sand Island, and we never got back. You got Makua Cave; we are fighting for that to end, too. And after you folks get up and leave the contamination stays forever. Our channels between our island are contaminated with shrapnels, ordnance, and our life in our islands is dying. Our children are suffering. We have many cases of birth defects, brain tumors, brain cancers, blood cancer, leukemia, and it's contaminated because it travels through the air. Dust travels everywhere. And I believe that it's time that the land has been taken back to be cleaned up and to keep it sacred - obvious no one can live on it. But we don't have to continue to contaminate and destroy and desecrate our aina. And that's all I have. I complete my (inaudible). Mahalo. Akui anui. We all holomua. We all need to move forward, but we all have to take our steps one day at a time and see what results can be done. That's all I have to say. Mahalo.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Martha Martin		<p>I was born and raised on Oahu, and have lived on Maui 59 years. Stopping the bombing of Kahoolawe Island was the right thing to do. Now it is the right time to end leasing Pohakuloa for military training. The war training is very destructive to that land, and should be ended.</p> <p>I oppose renewing the lease for military training in Hawaii.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Nancy Martin		<p>Hi, my name is Nancy Martin. I live at 68-1700 Manalo Place in Waikoloa Village, and my number is XXX-XXX-XXXX, and I would just like to request that the lease not be renewed for the training area for the military at Pohakuloa. I do not like hearing the bombs going off up there at nighttime different times of the year, and I also am very uncomfortable with having the waste that comes from bombing and military training on the land above the house here. So that's my input. If you need further comment, just give me a call back. I really hope that we can find a different place or a simulation or something more modern, rather than just bombing land in our community. So thank you for taking my testimony, and I hope it's helpful.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Peter Mathews		<p>The army has sufficient federal land for use in our state and should relinquish the leases on state lands. Military use of the land for training and caring for the land and ecosystem are not compatible goals. This is an opportunity for the military to do the right thing for the people of Hawaii by not pursuing lease renewal.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Alexis Mayhew		<p>I oppose this, as there is already a massive presence of military on all islands. Which is totally unnecessary.</p> <p>The constant disregard for the Hawaiians, and locals in general should no longer be tolerated.</p> <p>My daughter is Hawaiian, and all of her Ohana on the Big Island oppose of this as well. Enough is enough, go play your "rich man" war games somewhere else. Not our 'Aina for our Keiki! Mahalo</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Michelle Mazzetti		<p>I am speaking to what could happen in the event of the Pohakuloa State Land lease expiring without renewal; Waiki'i Ranch is surrounded by Federally owned land and is composed of highly sensitive volcanic ash soil, which if disturbed creates a serious health hazard for the Waiki'i area. I fear that if the State lease land is not utilized for the needs of training, they will resort to the Federally owned lowlands in this area which are much more sensitive to disruption than the rocky highlands. Not only would the usage of this area by heavy machinery pose a health hazard to residents of Waiki'i, it would result in irretrievable loss of valuable topsoil. This was demonstrated after the massive 2021 Parker Ranch fire, and manifested as gigantic dust clouds which blew all the way to Pu'uana'hulu--taking months to repair. Formerly Parker Ranch land, this Federally owned area below Waiki'i was grazed at that time in a regular fashion-- and after this land was purchased for the Stryker program in the 2000's the management of the non-native grasses was greatly diminished. Now only unmanaged animals roam the land, except for the small easement adjacent to Waiki'i which is leased to a private individual who maintains grazing animals. A change to the management of the greater area may be necessary to both reduce fire load and perpetuate native species. I believe the highest and best use of this land below Waiki'i Ranch would be a mixed use area available to public use, with conservation easements where the 3 critically endangered plants found in this area (sodendron hosakae, Lipochaeta venosa, and Vigna o-wahuensis) can be preserved and perpetuated with a management plan, along with other species native to the area. Mamane, Naio, Koaia, 'a'ali'i, and other dry land species could be introduced in strategic locations to help break the monoculture of non-native grass. This would be an unprecedented step by the U.S. Government to support Native Hawaiian Ecology and help mitigate centuries of human impact. Perhaps in a good faith effort, if this area was offered up for mixed use and conservation, would help alleviate the frustration of the ongoing use of Pohakuloa while helping the Military to maintain the amount of available training grounds.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
megan mcaffrey		<p>please close puakaola it serves no meaning ful purpose that I can see</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Julia Rose McGann		A'OLE DESECRATION ON POHAKULOA! Our 'āina does not need nor deserve the burden from the US. Our home is not a place for military practice! Please hear and actually listen to the kanaka.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Carol McMillan		<p>My name is Carol McMillan (ph.). I live in Waimea, and I won't be nearly as eloquent as some of the others who have spoken here. I am a relatively new resident. Only been here for a little over two years. So I have been coming to the island since before it was a state. I'm old, and I have watched the arrogance of the United States of America for my entire life, and it humiliates me. It's a history of this. From Bikini Island and from that area, I have listened to women who came and spoke in Seattle about what they called jellyfish babies. To this day, that land is so contaminated that women give birth to babies that are flat, round, with teeth and hair, and they breathe by going up and down and then they die. And they call them jellyfish babies. I mean, where are our hearts? It's the military industrial complex. There are people getting rich. There are people that are getting so rich over all the wars and all of the ordnance that you are dropping on this island. It's beyond comprehension to me that the list just goes on destroying land after land after land in the name of killing people. It's just tragic. Guantanamo in Cuba. We are occupying another country. That lease ran out, but we don't leave, and the United States government keeps sending money for the lease every year. And you know what Cuba does? It sends the money back to the United States, and says: Feed your own people first. We don't want your money. Just there are so many examples, and this is, yet. I couldn't believe it. I had no idea when I moved here and found out that 1/5th of the island, of this beautiful island is just used for blowing up things. I mean, it's a long way to Waimea from there, and I sit up in the middle of the night with the boom sometimes that happen.</p> <p>It's just, it doesn't need to happen. Somebody is making money by having all this live ordnance that you blow up and blow up, and then we tax papers have to pay for getting more of it so you can blow up. So whoever owns the military industrial complex, and that's who is getting to own our government. And as someone else said, it's not your fault. It's the fault of whoever makes these absolutely, to me, horrendous decisions to do so much in the name of just killing people. Everybody else has done a better job of naming the things that are happening because of that, so I just want to say thank you for listening. Mahalo.</p>	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Adrienne McNeill		I'm a graduate of the University of Hawai'i's at Mānoa. Using Pōhakuloa as a military training area has significant adverse impacts on the islands of Hawai'i. This military training area corrupts cultural practices and resources for Kānaka Maoli.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Kapua Medeiros		Aloha, my name is Kapua Medeiros, and I am calling to testify that I would like to see Pohakuloa shut down for good, and I would like Pohakuloa Training Center, Training Area to be no longer. I would like it to return to Kanaka Maoli. Enough is enough, and enough desecration has happened for too long. Please return Pohakuloa to Kanaka Maoli. That's my comment for now. Mahalo for the opportunity.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Jaerick Medeiros Garcia		<p>Jaerick Medeiros Garcia, in opposition to Pohakuloa Training. I'm recording this on my end, too, so that they know my testimony is being put in. Now, we don't need you guys here. The EIS is full of shit, like just like the United States is full of shit. Okay? You guys are illegal occupation. No lawful authority here in Hawaii. Stop desecrating our land. We don't want you here. We don't need you here. Go to O'ahu and get off the Big Island. It's full of shit. United States military is here to desecrate and kill off our resources. There is over 3,000 in opposition. You guys better frickin listen and listen good. Get the hell off our island. You guys are not wanted here. Stop the construction, because you know what? You guys have no lawful authority here. You guys don't belong here. Your president said so, President Clinton, 1993. Yeah? You are so full of shit, come over here and think you guys can do whatever the hell you guys like. You can **** off our island, man. Sick of you guys pillaging, raping our ****ing land, our Hawaiian land. Yeah? So fricking irritating. You guys bullshitting. It's like who (indiscernible) up there. ****ing lying everything you guys do. You guys are terrorists. The U.S.A., terrorists. Hawaii don't need you. You need us. For all these soldiers that is over there listening to this, you guys going to realize when you guys retire, when you guys think the United States military has screwed you and ****ed you in the ass. How many Veterans, how many Veterans hate the U.S. military for what they have done? All the problems that the military has done for their cause, the families, them, homelessness. You guys take care of nothing. Get the **** off our island. You guys don't belong here. I hate the U.S. military. You guys are ****ing full of shit is what. You guys are rapists, that's what you guys are. Stealing our lands. Stealing our water. Contaminating our water. You guys are making us hate you guys for what you guys are doing. It's you guys. Full of shit.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Jaerick Medeiros Garcia		<p>Hello, everybody. A couple months ago, 3,000 people testified in opposition to Pohakuloa lease extension. I was one of them. 3,000. It's a lot of people in Hawai'i to testify. We don't have to go back to the illegal overthrow. You folks know that we were forced to be Americans. We are not Americans. We are Hawaiian. We will die Hawaiians. We are not American.</p> <p>Your president, President Clinton, 1993, he admitted. He shared information. He said you folks illegally seized our government land. Yeah. No lawful authority. And you guys still here. I drive up and down that road, Saddle Road, and I see you folks have no intentions of leaving. You are making roads, cement buildings. You have a whole quarry back there. No intention of leaving. Senator Inouye. People, wake up. She's horrible. She's protecting you folks, allowing you guys to stay here. Commerce, wake up. No lease extension, not on Pohakuloa. We've got Hawaiians waiting for land. Yeah? DLNR lease extension, why? For more and more and more the Japanese. These guys, they want to continue to steal, support the people with the weapons. Yeah? We don't need you guys here. We really don't. This is the place where everybody can come together and not worry about war. Only you guys worried about war. Nobody else. We worried about our land that you guys desecrate, dropping bombs. Why? Go America drop bombs. Train up there. Get all different kind landscapes, weather. Why here? Because the Hawaiians? Huh? Because you guys already raped the Hawaiians for everything that they got? Shame on you guys. That's not right. You guys adults. What's right is right. What's wrong is wrong. You guys know that. Common sense.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Jaerick Medeiros Garcia		<p>Have respect for the people that's been here for thousands of years. If you guys wasn't in that clothes, you guys come, we accept you guys in our homes. We take care of you guys. You guys are our Kuleana. We will feed you folks. We will take care of you folks. Stop killing our lands. We need that. Our water, don't touch it. Stop drilling. That's important. Mahalo.</p>	<p>Thank you for your comment. The Army understands its responsibilities for proper stewardship of the land and has the utmost respect for Native Hawaiians. Please see Sections 3.3, 3.4 and 3.9 (Biological, Cultural, and Water Resources, respectively) of the EIS.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Glenn Metzler		Of the alternatives listed, I support alternative 3. However, the state should not lease any land that contains native forest or rare species and any of these areas not already incorporated in alternative 3 for non-renewal should be added to it. Hawaii has too many threatened and endangered species and already lost habitat to allow any further potential loss or degradation.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Ash Miller		Expanding military training on Hawaii will have its impact in the most negative ways. Native flora and fauna are already suffering from multiple occupation on the islands, from overdevelopment in both housing and bases. It would be the wisest decision to pull back in opening another training ground. What good is a army if they are harming more than protecting.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Caitlin Moon		<p>I am writing to express my vehement opposition to the army's renewal of their lease of 23,000 acres of ceded lands on Hawai'i Island in the area known Pōhakuloa. I must express my profound concern regarding the continued cultural, environmental, and societal harm caused by the military's mismanagement, broken promises, and destructive use of our most precious resources.</p> <p>First, I am gravely concerned about the use of depleted uranium in live-fire training on these acres. Not only will this aerosolized depleted uranium be distributed throughout the air, it will settle back onto the land, threatening the groundwater beneath Pōhakuloa. Groundwater that was, in fact, confirmed to be present by a 2015 study conducted by the Army and the University of Hawai'i.</p>	<p>Section 3.5.4.12 states "DU-containing munitions are no longer used at PTA." Section 3.5.4.12 also includes references noting that the depleted uranium did not aerosolize upon impact and per DODD 4715.11 high explosive munitions are not permitted to be fired into the same area as the depleted uranium impact locations.</p> <p>Section 3.5.4.12 notes that the Army completed a 1-year airborne uranium monitoring program in 2009 to determine if depleted uranium has impacted local air quality. Total airborne uranium levels collected from 210 air samples at PTA were within the range of naturally occurring uranium in Hawaiian soils and rock and were several orders of magnitude below the U.S. and international chemical and radiological health guidelines; therefore, the depleted uranium has not impacted local air quality.</p> <p>Section 3.6.4 discusses fugitive dust monitoring for depleted uranium at PTA, which concluded that the depleted uranium has not impacted air quality at PTA or in the surrounding areas.</p> <p>The following text was added to Section 3.5.4.12 from Final Site-Specific Environmental Radiation Monitoring Plan, Pōhakuloa Training Area, Hawaii, Annex 17 for Materials License SUC-1593, Docket No. 040-09083, September 2016: "The depth to groundwater in the vicinity of PTA is approximately 1,000 feet below the ground surface. Although the PTA area exhibits high soil permeability, the combination of limited precipitation and great depth to groundwater make it unlikely that depleted uranium would migrate into the groundwater."</p>
Caitlin Moon		<p>These groundwater resources are constitutionally protected Public Trust resources that are held in trust by the State for the benefit of present and future generations of the people of Hawai'i. NOT for the federal government. Kaho'olawe's groundwater was already destroyed by Military impact; O'ahu's aquifers continue to be threatened by the presence of fuel tanks put in place by the Navy. Hawai'i island must not be made to suffer the same consequences. The inevitable irreparable harm to Hawai'i's constitutionally protected Public Trust resources weighs heavily against the approval of the Pōhakuloa lease. Indeed, the Hawai'i Supreme Court has held that "the state has both the authority and duty to preserve the rights of present and future generations in waters of the state." In light of the recent and continuing egregious mishandling of the Red Hill/Kapūkākāki water crisis, the military has lost all credibility and cannot be trusted to properly mitigate the known (and unknown) impacts that continued training at Pōhakuloa will cause. The State must fulfill its duty under the Public Trust doctrine and reject the renewal of the Pōhakuloa lease.</p>	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Caitlin Moon		<p>Second, the army's previous lease agreement of 23,000 acres for 65 years for the sum of \$1.00 is astonishing from a fiscal perspective. Considering the fact that 46,255 Kanaka Maoli remain on the Hawaiian Homelands Waiting List, the exploitation and destruction of such a large area of land for such insignificant benefit constitutes a wildly irresponsible use of ceded lands. The \$0.015 per year that the Department of Defense paid for the use of this land is so laughable as to be disrespectful. I want to see an a chart showing what the federal government should be paying if they were paying fair market value for this land. Third, the Army has demonstrated that it cannot or will not comply with the bare minimum mitigation and remediation obligations that were required under the original agreement. In 2019, the Hawai'i Supreme Court ruled that the state has not fulfilled its responsibility in ensuring the military is being a respectful steward of this land. Part of the Army's agreement stated that the Army must "make every reasonable effort to ... remove or deactivate all live or blank ammunition upon completion of a training exercise." Yet - according to the highest court in the state, this has not been done. How, in good conscience, can the lease be renewed when the current agreement is not being adhered to?</p>	<p>Thank you for sharing your concerns. The Army's cleanup efforts after training exercises are discussed in Section 3.5.4.11. Text revised to state Army removes or deactivates all live and blank ammunition upon completion of a training exercise in compliance with the lease and removes solid waste prior to departing a training area or range facility in accordance with the U.S. Army Garrison, Pohakuloa (USAG-PTA) External Standard Operating Procedures (2018).</p> <p>In accordance with the lease, and under the provisions of existing law, the Army retains responsibility for cleanup and restoration of former training areas. After the lease expires, the Army will follow Army regulations to determine how and when the cleanup and restoration will occur, following the CERCLA process.</p>
Caitlin Moon		<p>Finally, Pōhakuloa is known to contain a number of cultural and archeological resources that have never been properly cataloged , examined, or maintained. The United Nations Declaration of the Rights of Indigenous People states in Article 12 that "Indigenous people have the right to...maintain, protect, and have access in privacy to their religious and cultural sites..." These rights are similarly protected by state law. The renewal of this lease on this land will prevent Kanaka Maoli from doing just this and further risk the destruction of priceless cultural artifacts and history. THE LEASE CANNOT BE RENEWED.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
B Moore		<p>Stop the desecration</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Kimo Moore		<p>The US Army's responsible stewardship of the aina is worthy of their remaining to training on the land, allow study of the flora and fauna, and protect the land from developers and corrupt or inept state officials. The US Army must abide by Federal laws and mandates, which are broader in scope and character than our state laws. The Federal approach has been pono under the Obama and Biden administrations. I would ask the US Army to please remain on the 23,000 acres listed in the EIS and strive to maintain its stewardship and improve as technology and our understanding continues over the next many decades. aloha, Kimo</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Michelle Morin		<p>Deoccupy Military from our sacred 'āina; we need to protect our natural resources &amp; the military has proven they are not concerned with our environment &amp; natural resources; there is a long history of desecration by the US Military in All of Hawaii &amp; it is straight Wrong!!! STOP POLLUTION &amp; DESECRATION OF OUR SACRED KŪPUNA!!! Our keiki deserve to live in a safe, clean, pono environment! Stop the wrongs that the US has continuously done to all native lands here &amp; everywhere!!!</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Michelle Morin		<p>Please stop desecration of Pohakuloa. The military has used Pohakuloa for training grounds &amp; bombing much too long! The evidence of what bombing has done is evident in what has happened to Kahoolawe; the military was negligent in their contracts to care for the land they pay so little to use. From Kahoolawe, Makua, &amp; Redhill tanks-we are seeing the detrimental impacts on our natural resources; we have the opportunity now to preserve our most precious resources before it gets destroyed! The military has proven to be the worst stewards in all the world to the environment so it's obvious that what they are doing at Pohakuloa will only have detrimental affects on our natural resources &amp; the people indigenous to this land. STOP THE MILITARIES BLATANT DISREGARD &amp; DESECRATION OF HAWAII'S NATURAL RESOURCES NOW!!! what will our children have left of a land that is bombed &amp; disrespected? Bombing on Pohakuloa needs to end!! War games in Hawaii's waters need to end!!!</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Maki Morinoue		<p>Aloha My testimony is in opposition to the retention of 23,000 acres of state-owned land. The Military has failed to clean up after their mess where ever they have occupied here in Hawai'i State. Stop the madness and start protecting our land, our residents and start respecting the native people of the land.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Dailee Morrone		<p>I was born and raised in Hawai'i and lived in Hilo most of my life. Please, just give Hawaiians their land back. We don't need another Red Hill situation and the military and state don't seem to care about the people anymore.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Bret Mossman		<p>I just want to give a couple comments on the finding of no biological significance at PTA. So, for instance, in the duration that PTA has had management over the land that they have governed, six species of endemic birds have been extirpated from the area. If you don't know, Hawai'i is the extinction capital of the world for birds. We've lost over 77 species. So it's very alarming to me that there was a finding of no biological significance, because in the duration that you folks have had management six species have disappeared, as I have said. So what the issue is is that it may not have been a direct action -- a direct result of your actions in the reserve, but it is a direct result of your inaction. So here in Hawai'i species require dedicated conservation work, and if you don't do it they will disappear. And that's still currently happening with an endangered species that is still found in the area, the Band-Rumped Storm Petrel or Ake'ake (ph.). It's the last endangered species that is found in PTA, and it's one of only three remaining endemic bird species that can be found in the area. So I think my major concern is that you folks are not adequately addressing the biological resources in the area. And most of that is due to inaction, whether it be from predator control or not excluding ungulates, but habitat is continuing to be degraded and more species are in jeopardy of being lost from that area. You have already lost six. You only have three left. You guys really need to step up in what you are doing with your management there. On O'ahu, the O'ahu Army Natural Air Reserves, they have some of the largest populations of native birds left on O'ahu. Meanwhile you folks continue to lose them. So 'Alala, Ua'u, Nene, i'iwi (ph.) have all been lost from these lands. So that's something that I'm very deeply concerned about and something that you folks need do a much better job of addressing if this lease is going to continue.</p>	<p>Thank you for sharing your concerns. The Army understands its responsibilities for proper stewardship of the land. Native species (Section 3.3.4) and impacts to protected and native species (Section 3.3.6) have been revised and expanded to include natural resource management measures that the Army is implementing that benefit the land and protected species. Existing management measures are addressed in Section 3.3.4.5 and best management practices and standard operating procedures are located in Appendix E.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Bret Mossman		And even in the last year you can drive through over Saddle Road, the Aweoweo shrublands that surround the base have been completely decimated by goats. That's because you guys have not built fences, you have not protected that resource, and that's going to be an area that is going to provide a lot more dust, collect less water, and have multiple impact on species that we frankly don't even know exist yet. So that's something that I think really needs to be reconsidered in this evaluation because there are some biological resources that are under threat because of your folks' inaction. And so it might not come as a direct result of your action, but inaction here in Hawai'i is an action, and it has been seen there over your record of management because those species have been lost. Thank you very much for your time	Thank you for sharing your concerns. The Army understands its responsibilities for proper stewardship of the land. Ungulate control measures are discussed in Section 3.3.4.4.
Zack Murphy		I would like to see the land be returned to the native endemic species that inhabit the land for the million years to come we humans have tragically destroyed the earth within the past 1k just do our job to try to help preserve the special ecosystem that supply's us.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Isaac Nahuwai		Aloha, This is a letter opposing the further desecration of Pōhakuloa. We feel the bombings with all our senses and the 'āina has been radically changed by the bombings. STOP THE DESECRATION. -  Na'u nō, na 'Ika'aka Nāhūewai Kumu 'Ōlelo Hawai'i - Hawaiian Language Lecturer Ho'olauka'i Hu'ea'o - Internship Coordinator Ka Hale Kuamo'o - Hawaiian Language Center Ka Haka 'Ula o Ke'elikōlani - College of Hawaiian Language Ke Kulanui o Hawai'i ma Hilo - University of Hawai'i at Hilo 'O MAULIOLA PŪ ME KĀKOU	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Janelle Naone		I am against the military retaining Pohakuloa for another 65 years or even 1 more year. The \$1/year lease is atrocious and our 'aina needs time to heal. The military has proven to be a bad steward of our lands and are destroying it like Kaho'olawe, Makua Valley, Waikane, etc. History has shown us that promised restoration of 'aina always fails as the damage is just too horrific. Enough is enough, move out already. Go do your training in the vast open expanses of the continental United States in an area where there are no sacred places.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Nicole Navarro		Aloha, Please stop the desecration of Pohakuloa and not allow the military to continue to use it as a target/bombing site. Mahalo	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Basara Nekki		Don't listen or give in to the "Hawaiian" activists. We are Americans. God bless America!	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Charles Ogle		I believe in a strong defense for this country. The events in Ukraine over the last two months have underscored this need. A strong defense requires that our military forces be well equipped and well trained. Accordingly, I support the Army's training land retention at the Pohakuloa training area. Thank you.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Curen Ohama		Aloha US Army. We got so many environmental problems in this little place in the middle of the pacific. Please just stop with the bombing of Pohakuloa. We all know the price isn't worth it. In fact maybe be the one to show what true Peace looks like. Do something real for the planet. Enough blood of mankind and enough blood of the earth has been shed. It's gonna be ok if you folks say enough for Pohakuloa. ??	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Ohana / Isaac Harp	Ohana	I represent my ohana. We are citizens and patriots of the Hawaiian Kingdom. We cannot and will not share our Aloha with the United States Army or any other agent or agency of the United States while you continue to violate, desecrate, pollute and destroy our country under your belligerent occupation of our internationally recognized neutral nation. The hardships that our ohana and other Hawaiian citizens have been forced to endure since the 1893 unlawful overthrow of our government by United States of America and the prolonged unlawful United States of America's occupation of our country are too numerous to mention, but the United States of America already knows that. We shall not respond to your fraudulent Draft EIS. It filled with false information. In accordance with international laws of occupation, it is unlawful. In accordance with the Hawaiian Kingdom's neutral nation status, it is unlawful. It violates treaties between the United States of America and the Hawaiian Kingdom. But again, the United States of America already knows that.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Ohana / Isaac Harp	Ohana	On January 16, 1893, United States diplomatic and military personnel conspired with a small group of individuals to overthrow the constitutional government of the Hawaiian Kingdom and prepared to provide for annexation of the Hawaiian Islands to the United States of America, under a treaty of annexation submitted to the United States Senate, on February 15, 1893. Newly elected U.S. President Grover Cleveland, having received notice that the cause of the so-called revolution derived from illegal intervention by U.S. diplomatic and military personnel, withdrew the treaty of annexation and appointed James H. Blount, as Special Commissioner, to investigate the terms of the so-called revolution and to report his findings. The report concluded that the United States legation assigned to the Hawaiian Kingdom, together with United States Marines and Naval personnel, were directly responsible for the illegal overthrow of the Hawaiian Kingdom government.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Ohana / Isaac Harp	Ohana	The report details the culpability of the United States government in violating international laws and the sovereignty of the Hawaiian Kingdom, but the United States Government fails to follow through in its commitment to assist in reinstating the constitutional government of the Hawaiian Kingdom. Although the United States of America recognized it's wrongdoing then and ignores it now, the United States of America continues on a most dishonorable and deceitful path in the Hawaiian Kingdom and in fact across the world that we share. We oppose any and all violations of international laws of occupation by the United States against the Hawaiian Kingdom, a peaceful and neutral country. We oppose the continued violence inflicted by the United States upon the lands, sea, and air of the Hawaiian Kingdom. We oppose the continued psychological trauma inflicted by the United States upon the citizens and non-citizen patriots of the Hawaiian Kingdom. We oppose the United States' continued violations of our human rights and continued violations of treaties entered into by our respective countries. The United States professes to be an honorable country but to actually be honorable requires actual honorable actions by the United States and it's agents.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Kane Ohe		Please continue to conduct the training and defense of our freedoms! I am native Hawaiian activist and do not want to endanger myself or do any protections against china or russia, so want you all to do it for me. Do not pay attention to my other native who complain because they are discrimination against their own fear to do anything for the protections! Please keep up the good works and protecting us, thank you.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Gina Ok		Military training is unnecessary, especially in Pōhakuloa. The people of Hawaii has suffered time and time again due to the US military. Funds going towards such military activity can be better used to assist Hawaiian people, especially with people with economic struggles.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Liam		My name is Liam O'Malley. I'd like to, it's a poem. I didn't vote for the state of affairs. My emotional state come in prostate fear in my fears. In all reality I'm under prepared. Because I'm ready for	Thank you for your comments. The Army understands its responsibilities for proper stewardship of the land and has the utmost respect for Native Hawaiians. Please see the revised Sections 3.2 and 3.4 (Biological and Cultural

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
O'Malley		state come in prostate tear in my tears. in all reality, I'm under prepared. because I'm ready for war but not sure if I'm ready to care, and that's why I'm under prepared, because I'm ready to fight	has the utmost respect for Native Hawaiians. Please see the revised sections 5.2 and 5.4 (Biological and Cultural Resources) of the EIS and Appendix I for the Cultural Impact Assessment.
Liam O'Malley		War is a game of tic tac toe. Nobody wins. And development for the sake of development is the ideology of a cancer cell. You want more and more and more and more. When is it ever going to stop? How about you guys build some water catchment tanks and start catching water? How about you guys start feeding people? I have nothing against you brothers. I take issue with the cowards who start wars and make you fight them. My Godfather was a green beret in Vietnam. He died when I was five years old because of Agent Orange poisoning. My uncle was a Sergeant first calvary in the U.S. Army. I'm going to tell you something straight up. I grow Psilocybin mushrooms for Veterans of PTSD. It's not your fault, brothers. I love you guys. It's time to end war. Pau already.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Liam O'Malley		E Hawai'i e ku'u one hanau e. I forget the rest. But you know what I'm trying to say. This is not the U.S.A. There was never a treatise that was issue. Hundred years later all we got was a built-in apology for stealing our nation. You have 133,000 acres of stolen land, plus everything else. I'm from Kaneohe. I hear the whatever it is, the loudest *** thing at 12:00 at night. Have to move over here just so I can get a good night's sleep. We'll help you pack your bags. I mean, come on, you guys. Do the right thing.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Alexis Orrick		To retain this land is to infringe on the rights of the Hawaiian people and gross misconduct on behalf of a military that is supposed to protect the sacred ideals of democracy and human rights. The military has no place acquiring this land.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Mialisa Otis		I oppose land retention by the Army at Pōhakuloa. I understand the need for military training areas, but not in Hawai'i. There is so much land available on the continent that the army can obtain. I hope our state keeps the land in our possession. I see this as a land swap, and we need more land back. Mahalo, Mialisa	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Carol Pacheco		I think the land and water around that area should be tested for contaminants and if there are, they should not be allowed to renew their contract. If there are none then I think we should let them continue but not allow them to buy any more land. I understand that they contribute to the economy but at what cost. do we want a situation like they now have on Oahu with the water issues? Or do we want to end up like Kahoolawe? Hawaii Island and its people need to be thought of first.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Avalon Paradea		<p>Okay. All good? Aloha. My name is Avalon Paradea. AVALON, P-A-R-A-D-E-A. I'm here to oppose the continued renewal of the 23,000 acres of land. I had the privilege of working at Pohakuloa Training Area for three and a half years up until last June. It was a very challenging job on a lot of different levels. I was working for the Research Corporation of the University of Hawaii for the Cultural Resources Program. The amount of work that we did up there was a lot, but it was all mostly just for you folks to check boxes. Much of the land that I worked on personally was within the state lease area, especially training areas 18 and 22. I experienced, there was a 1000 acre fire that occurred in 2018 within endangered plant habitat, and that was because of an accidental flare being dropped out of a helicopter during the middle of summer, in the middle of the night. It took a long time for the fire to be put out effectively. It burned a lot of native plants. It caused who knows what kind of damage to ecological resources in the area. Unfortunately, that particular area had not been archeologically surveyed. We only went in there as a response to the fire, and that is a huge problem. And that is often, in my experience, what happens at Pohakuloa Training Area. Things are not assessed until all of the sudden they might have been damaged. Nobody is going in and checking these areas in advance. This is not a shortcoming of the Research Corporation of the University of Hawaii. This is a shortcoming of the military. RCUH doesn't even have the contract anymore. All of my co-workers, about two months after I left effectively got fired. The contract was changed over to Colorado Environmental Management of Military Land, which just suggests to me that the military does not take their relationship seriously with our community. Instead, they hire out to lower bidders, often bringing in people from outside of Hawaii to do work that is very culturally sensitive. I'm not kanaka maoli. I'm not Hawaiian. I am a white person. I was raised in Waikoloa Village, but I take the culture here very seriously. I care a lot about the people that live here.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Avalon Paradea		<p>I know for a fact that there are iwi kupuna within the state leased lands - - it's wild saying that and knowing I don't have to worry about getting fired, but that is the truth. And I strongly support aunty who brought that up. These are people that need to be given respect and be able to sleep easy in their rest. Our environmental resources go, I am an avid lover of plants. I am just devastated to see how much damage has been done in this area because of training over time. The plant communities up there are suffering. I give a lot of credit to the Natural Resources Program. Those people are true hammers. Like they go in there and they do some heavy, heavy work. But an accidental fire can obliterate all of that overnight. These things can't just keep happening. This is not just human error. This is big human error. This is big military error. I don't know if I can keep going. I do have a little bit more to say. Living in Waikoloa Village, also, I think a lot about human health. My mother is dealing with severe bronchial issues with no known reason. We have been breathing in this air my whole life. I would like to think that I'm breathing in fresh, clean air. But now that I have worked in this area I literally see the dust from Pohakuloa, not anywhere else, but from Pohakuloa flying down into Waikoloa Village. A lot of the dust we get at our house is from this region, and it should be safe, but I worry about lead, in particular, which not enough people are talking about, and we know that lead is in the cartridges that litter the landscape. There is too much trash. All of this just needs to stop, and the damage needs to be cleaned up before it goes back to the state. Mahalo.</p>	<p>Archaeological and cultural resources known from the State-owned land at PTA, and the Army's management program for these resources, are described in Section 3.4 of the EIS.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Avalon Paradea		<p>I am writing in opposition of the Army's proposed retention of 23,000 acres of State-owned land. I am in favor of the No Action Alternative, under which the Army retains no percentage of these 23,000 acres once the lease ends in 2029. I was raised in Waikōloa Village, where I continue to reside with my mother, brother, and partner. Between 2017 and 2021, I worked as a cultural resource technician (eventually moving up to a specialist position) under the Research Corporation of the University of Hawai'i (RCUH) at PTA. During the three and a half years I worked within this 'āina, I learned a great deal – both about the rich cultural legacy that Kānaka 'ōiwi (Native Hawaiians) share with this region, and the mistreatment of this land at the hands of the Army. It was an emotionally taxing job for many reasons, and I chose to leave in the summer of 2021 to pursue my master's degree in the TCBES program at UH Hilo. Within the draft EIS, the Army identifies 15 environmental areas that could be impacted by the Proposed Action. Herein, I provide detailed thoughts on nine of these areas which I feel best qualified to speak on.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Avalon Paradea		<p><b>Biological Resources</b>            Within the 23,000 acres of State-owned land reside numerous endemic and indigenous plants and animals, including endangered species. In my opinion, staff in the natural resources office (NRO) do a fantastic job working to protect native species as best they can. However, their dedication is quickly rendered meaningless in the face of severe accidents caused by military negligence. In the summer of 2018, a fire was started by Army personnel during a routine helicopter exercise. This fire consumed over 1,000 acres of land, primarily within Training Areas 18 and 22 (TA 18 and TA 22). Both TAs contain fenced units for the purposes of protecting endangered plant species. From what I understand, no endangered plants were known to have been harmed during the fire; however, many native species were destroyed. Over the course of several months shortly after the fire, my team and I were tasked with conducting archaeological surveys within these fenced units. The aftermath was shocking... thousands of dead 'ohi'a (<i>Metrosideros polymorpha</i>), naio (<i>Myoporum sandwicense</i>), māmane (<i>Sophora chrysophylla</i>), 'a'ali'i (<i>Dodonaea viscosa</i>), and other plants as far as the eye could see. The death of these native species allowed invasive fountain grass to colonize the area expansively. The loss of cover resulted in increased dust storms which negatively impacted those of us living downwind in Waikōloa Village, myself included.</p> <p>Additionally, I personally observed endemic pueo (<i>Asio flammeus sandwichensis</i>) within TA 18. These ground nesting owls are highly susceptible to the negative effects of fires and other such devastating environmental tragedies. This was not the only fire caused by military training that occurred during my years working at PTA, and I am aware of numerous other fires that have occurred before and since my employment there. Unfortunately, the Army is not required to publicly share data regarding fires that occur on Army land. I find this highly problematic. I strongly advise sharing this information with the public for the sake of transparency, allowing community members to create an informed opinion regarding the Army's broad swath of interactions within the Pōhakuloa region. It is important to note here that the State-owned lands include Palila Critical Habitat. Palila (<i>Loxioides bailleui</i>) are a critically endangered Hawaiian honeycreeper. These birds are highly reliant on māmane trees for their sustenance and habitat; the disappearance of māmane in the aforementioned fire is no minor thing. Another species of interest is the 'ua'u (<i>Pterodroma sandwichensis</i>). These birds once relied greatly on the Pōhakuloa region for habitat and nesting, as well documented by historic accounts and archaeological evidence. The draft EIS states that "no colonies or nesting have been confirmed on PTA," which I assume refers to active nests. This begs the question: why? Why might 'ua'u no longer find this landscape hospitable? It is probable that Army activity is a primary factor in the disappearance of these birds from this region.</p>	<p>Thank you for sharing your concerns. The biological resources Section 3.3.4.2 has been updated to include impacts from recent wildland fires.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Avalon Paradea		<p>The Game Management Program has done little to mitigate the negative effects of invasive ungulates within the landscape. While fencing does provide significant protection to native plants, there remain thousands of ungulates that roam the land outside these enclosures, causing damage to native species. If the Army is serious about aiding native species, they need to do a great deal more when it comes to culling sheep and goats on a large scale. While the Army may claim to provide resources that benefit biological organisms within the Pōhakuloa region, such claims mean nothing when the Army itself poses the greatest immediate threat to lifeforms in this area. The Army makes grand statements of applying lessons learned from recent mistakes, but the harsh reality is that ammunitions in such a dry landscape will invariably result in accidental fires, regardless of mitigation methods. I take issue with the Army's assertion that Full Retention of Stateowned lands will be more beneficial to native species than the No Action Alternative. This claim flies in the face of hard evidence to the contrary. Pōhakuloa was once a landscape teeming with life, much of which has been significantly reduced due to Army activity.</p>	<p>Thank you for sharing your concerns. The Army understands its responsibilities for proper stewardship of the land. Section 3.3.4.2 has been updated and discusses ungulate management strategies which include exclusion fence units and control; Figure 3.5 shows the locations of the fence units. Section 3.2.4 discusses recreational hunting that is used as one of the strategies to control ungulates.</p>
Avalon Paradea		<p><b>Cultural Resources</b>  It is important to note that the entirety of the Pōhakuloa region is a culturally significant entity. This landscape holds importance as a region long utilized by Kānaka ʻŌiwi for the acquisition of natural resources, for ceremonial conduct, and for safe passage between various moku (districts) and ahupuaʻa (land divisions within moku), among other activities. Were it not for Army occupation, this region would still be enjoyed as a safe locale to conduct cultural practices. I am aware of hundreds of archaeological sites that exist within the State-owned lands. Like the biological organisms mentioned above, these features are at risk from continued Army activities. Under Section 106 of the National Register of Historic Places (NRHP), all federally owned or managed lands require thorough archaeological assessments. Despite this requirement, prior to the 2018 fire, no proper archaeological surveys had been conducted within TA 18 and 22. It was not until after the fire had decimated these areas that my crew was asked to conduct a baseline survey. I should not need to spell out how utterly backwards this was. Ultimately, our efforts resulted in the discovery of several interesting sites. One of these sites contained historic bottles that, sadly, had broken and burned due to the heat of the fire. The fire also ruined any chances at properly identifying fireplaces or hearths, generally identified through the presence of charcoal. Even if historic charcoal were identified, the 2018 fire would render any possibility of radiocarbon dating such sites unlikely.</p>	<p>Section 3.4.2.1, ("Evaluation of Traditional and Cultural Properties Under NHPA") clarifies that this EIS complies with the requirements of NEPA and HEPA and does not address compliance requirements under NHPA or HRS Chapter 6E. NEPA has no requirement or procedure for conducting studies or assessments of historic properties significant for religious and cultural reasons. A Cultural Impact Assessment (Appendix I) has been prepared in support of the HEPA requirement to identify effects of the Proposed Action on cultural practices.</p>
Avalon Paradea		<p>In the draft EIS, it is stated that 11,920 acres of State-owned land have yet to undergo proper archaeological investigation. There is a vague statement that "portions of unsurveyed State-owned land comprise remote and inaccessible areas" and that these places "may have low potential for extant cultural resources." This reads as flippant. There should be no assumptions made on the Army's end regarding the likelihood of cultural resources in any given area. I spent an overwhelming amount of time working in the office during my time at PTA. Why was my team not investigating these unsurveyed lands? It often felt as though our team was not provided proper direction or adequate communication by the Army archaeologist, whom we took direction from.</p>	<p>EIS Section 3.4.4.3 has been revised to describe why certain areas have not been surveyed. Figures have been refined to show where surveys have been completed, and the general locations and types of sites within State-owned lands.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Avalon Paradea		<p>The draft EIS states that under Full Retention, impacts to archaeological sites would be "less than significant." This wording is incredibly vague and means basically nothing without substantial clarification. If an iwi kūpuna (ancestral burial) is burned in a fire, but it is the only archaeological site affected in such a scenario, is that considered "less than significant"? Who determines what extent of damage is or is not significant in such a circumstance? What are the criteria? How are Kānaka within the community involved in such determinations, if at all? Under Full Retention, the ability for Kānaka 'ōiwi to perform Traditional and Customary Practices is deemed "significant but mitigable." Again, this wording is not straightforward. What does "mitigable" mean, if traditional practices are significantly hindered? Under the No Action Alternative, it is noted that cultural practices would benefit from the absence of Army involvement. Here, I must wholeheartedly agree. The removal of the Army from these lands would be of benefit to Kānaka 'ōiwi who wish to build pīlina (relationships) with Pōhakuloa. Cultural connections to the land are beneficial to people and to the continued health and prosperity of the land, itself.</p>	<p>Section 3.4.4.4 of the EIS and Sections 5.0 and 6.0 of the CIA have been revised to reflect additional information provided by interviewees who responded to a second request for input in December, 2022, following the height of the COVID-19 pandemic.</p>
Avalon Paradea		<p>Hazardous and Toxic Materials and Wastes Rather than focusing on this section as a stand-alone topic, I apply my concerns regarding elements of this section to other associated sections below. Air Quality and Greenhouse Gases In the previous section titled Hazardous and Toxic Materials and Wastes, numerous pollutants and their concerns are outlined. I lump many of these concerns with Air Quality due to my experience living in Waikōloa Village, which is located downwind from PTA. Under this section, it is stated that the trade winds "result in relatively good air quality." Unfortunately, this is not the case for Waikōloa. These trade winds bring copious amounts of dust and debris straight from Pōhakuloa – this is not an overstatement. Years of driving back and forth between PTA and Waikōloa allowed me to observe that much, if not most, of the dirt that covers our town stems directly from PTA. Our prolonged drought and the fact that this landscape has been largely reduced to barren fields of exposed soil exacerbate this issue. The draft EIS openly admits that "long-term beneficial impacts on air quality would result from the No Action Alternative." I would love to see our skies finally clear and to not feel concerned that I may be breathing in harmful chemicals such as lead.</p>	<p>Section 3.6.4 discusses PTA's fugitive dust monitoring results.</p> <p>Sections 3.6.4 and 3.6.6 revised to state PTA manages and would continue to manage fugitive dust via 1) erosion control and stabilization techniques (revegetation, erosion control structures, site hardening, dust palliatives) under the Land Rehabilitation and Maintenance component of the Integrated Training Management Program (USAG-HI &amp; USARPAC, 2013), 2) adherence to Unified Facilities Criteria 3-250-09FA, Aggregate Surfaced Roads and Airfields Areas, which has dust control requirements for aggregate surfaced roads and airstrips of airfields at Army installations, and 3) best management practices such as maintenance of roads and training trails, maintenance of vegetative cover, periodic application of water to control dust, and modifying training during high risk conditions. Integrated Training Management Program Land Rehabilitation and Maintenance project best management practices are assessed annually during Range and Training Land Assessment reviews (U.S. Army Hawaii Range Division, 2022).</p>
Avalon Paradea		<p>Noise Those of us in Waikōloa Village regularly hear training activity throughout the day. I am aware of many people in Waimea having the same experience. It is a disturbing noise, even so far away. I have also experienced the upsetting noises of military helicopters flying low over Waikōloa Village, including late at night. If we are frightened by these sounds, I can only imagine how distressing these noises must be to the native birds that call Pōhakuloa home. Pueo, nēnē, 'amakihi, and other species are almost certainly bothered by these noises, which are excruciating at close range. I wonder if such sounds are one reason why 'ua'u no longer nest in Pōhakuloa? I find it ridiculous that the draft EIS states that under Full Retention, there is a "less than significant" level of impact regarding noise. I cannot fathom how this determination was made.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Avalon Paradea		<p>Geology, Topography and Soils Vegetation has been significantly reduced in the Pōhakuloa region due to military activity. Continued training is devastating to our soil health. Erosion is a major concern in our island environment, and as mentioned above, such erosion has contributed to poor air quality in Waikōloa. No EIS is being performed within the Impact Area, which undoubtedly contains the most degraded soils throughout PTA. Considering the ammunitions fired into the Impact Area are deployed from State-owned lands, it seems pertinent to include the Impact Area within the current EIS. The draft EIS claims that Full Retention will result in "less than significant" impacts; I disagree. Continued training, resulting in the continued addition of ammunitions and associated metals and chemicals to our landscape, and continued physical impacts resulting in erosion, are hardly insignificant.</p>	<p>Ongoing impacts of training to geology and soils in the region of influence defined in the EIS is analyzed in Section 3.8. We respectfully acknowledge your disagreement with the EIS findings.</p>
Avalon Paradea		<p>Water Resources The Pōhakuloa region is a vital watershed. As stated in the draft EIS, "the uniqueness [of this groundwater] is 'irreplaceable'; and the vulnerability to contamination is classified as 'High.'" Given the potential pollutants listed in the Hazardous and Toxic Materials and Wastes section of the draft EIS, I am concerned that these and other pollutants could infiltrate the aquifer. While the groundwater at Pōhakuloa is not directly consumed, all water within our porous, volcanic island is interconnected, eventually reaching water sources that are consumed as well as flowing out to the sea. Lead is a particular concern, as no amount of lead is safe for biological consumption.</p>	<p>Section 3.9.4.6 has been added to the EIS and documents the existing management measures utilized by the Army to protect water resources. The State Department of Health (DOH) Safe Drinking Water Branch (SDWB) monitors groundwater quality of aquifers as described in EIS Section 3.9. SDWB has released groundwater contamination maps for Hawai'i Island that show most contamination is along the eastern coast of the island. You can learn more directly from the source cited in this section, the DOH SDWB Environmental Health Portal at <a href="https://eha-cloud.doh.hawaii.gov/sdwb/#!/home">https://eha-cloud.doh.hawaii.gov/sdwb/#!/home</a>.</p>
Avalon Paradea		<p>As stated in the Hazardous and Toxic Materials and Wastes section, "Lead is the primary COC from small caliber munitions." The draft EIS further states that the use of military munitions pose a potential threat to soil and groundwater quality. The draft EIS mentions that soldiers are required to collect spent casings, but in my years working on the landscape, I encountered tens of thousands of bullet casings and similar ammunition debris. Sometimes these were scattered, solitary fragments or cartridges; often, these were sizeable piles of rubbish. Dates for bullet cartridges ranged from the 1940s to recent.</p>	<p>As noted in Section 3.5.4.11, soldiers are required to collect casings from spent rounds, wood boxes, and other solid waste debris generated during live-fire training and return them to the ammunition holding area and ammunition supply point for recycling or disposal, as appropriate.</p> <p>Sections 3.5 and 3.15 supplemented with relevant information from Pohakuloa Training Area Range Operations Standard Operating Procedures (2022) regarding cleaning ranges after training.</p> <p>In accordance with the lease and under the provisions of existing law, the Army retains responsibility for cleanup and restoration of former training areas. After the lease expires, if deemed necessary, the Army would follow Army regulations to determine how and when the cleanup and restoration of State-owned land not retained would occur, following the CERCLA process.</p>
Avalon Paradea		<p>The Army has done a terrible job of removing this trash which continue to threaten our soil and water resources. Additionally, surface water occurs in the form of intermittent flows through several streambeds. As mentioned in the draft EIS, one of these beds is Popo'o Gulch, which feeds into 'Auwaiakeakua Gulch. The latter of these runs downslope to Waikōloa Village. During severe rain events, I have personally witnessed substantial water movement through the gulch and connected tributaries, as well as flooding in the lower portions of Waikōloa. Such runoff has the potential to carry military debris and related pollutants straight into our community. Have there been any scientific studies on such rain events to assess the safety of this runoff? What about long-term effects of these pollutants gradually entering our drinking water? Once again, I disagree with the determination that Full Retention will result in "less than significant" effects to our water resources. There is not enough scientific evidence to back up this claim.</p>	<p>Water resources and applicable studies are discussed in Section 3.9, and includes findings of a 2010 drainage report that concluded stormwater that enters or is generated within the developed portions of PTA does not exit the installation due to the very high percolation rates of lava flow and cinder at the site.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Avalon Paradea		<p>Socioeconomics The military is often touted as being a necessary employer within the islands. If we choose to look at this solely from a numbers perspective, the Army employs only ~1% of the population on Hawai'i Island (1,962 employees out of a population of 199,459). Under the No Action Alternative, the draft EIS states that socioeconomics would be negatively affected were the Army to cease managing the State-owned lands. Ultimately, this claim is contentious. Undoubtedly, many people would face the prospect of losing their jobs; but what the draft EIS ignores is the potential for new employment opportunities through the State or other entities. I am personally of the opinion that arguments in favor of Army occupation for the sake of our economy are detrimentally unimaginative. Our community deserves to grow beyond the means of relying on the Army for employment. This will take effort, but it will be well worth it if it means healthier soil, air, and water for ourselves and for future generations.</p>	<p>Thank you for your comments. Please see Section 3.10 of the EIS regarding socioeconomics.</p>
Avalon Paradea		<p>Furthermore, it is important to note that for the Army, employment is merely a numbers game. Two months after I left my position with PTA CRM, the Army chose not to renew their contract with RCUH. With only two weeks' notice, all of my previous coworkers and supervisors lost their jobs. It took several months for the Army to effectively onboard the new contracting organization (the Colorado Environmental Management of Military Lands, or CEMML), which is illegal to not have had a functioning CRM team for any amount of time. From what I understand, the Army and CEMML eventually offered several of my previous teammates their positions back, but the majority declined. I cannot blame them. It is inhumane to cast people aside with almost no advance notice and expect that they will be grateful to have their jobs reoffered several months later. The decision to begin a new CRM contract with CEMML also means that RCUH – which is a local entity, unlike CEMML – lost money. Hiring outside contractors in no way benefits our local socioeconomics. Through this action, the Army at Pōhakuloa showed their true colors; they have no interest in building positive, lasting, meaningful relationships with the community of Hawai'i.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Avalon Paradea		<p>Human Health and Safety Once again, I shall refer back to the Hazardous and Toxic Materials and Wastes section. The contaminants that plague the landscape at Pōhakuloa are a huge concern for human health, both for employees at PTA and for the general public. Since 2011, my mother has experienced severe neurological issues of unknown origin, manifesting as extreme pain throughout her body. Since 2019, she has suffered a severe, persistent cough that has worsened over time. She takes impeccable care of her body, but she has lived downwind from PTA for over 25 years; I cannot help but wonder if breathing contaminants may be a factor in either, or both, of her health problems? I also worked alongside many people who experienced mysterious, undiagnosed, and sometimes debilitating health concerns during or shortly after their time at PTA. I myself have experienced sudden and incapacitating health problems of no known origin, both during my employment at PTA and several months after leaving my position. I realize that health is a complicated topic, but my concern that our community may be suffering ill effects caused by military activity should be taken seriously. In the draft EIS, Full Retention of the State-owned lands is deemed as resulting in "less than significant" adverse effects for human health and safety. Considering the pollutants that litter the landscape and the threat of wildfires, I must disagree with this determination. There is no clear evidence suggesting that Army activity is having no negative impact on human health.</p>	<p>Impact analysis in Section 3.5, Hazardous Materials and Wastes considers public exposure to military-related hazardous materials. Impacts analysis in Section 3.16, Human Health and Safety considers safety risks and hazards. Additional rationale for impacts determinations has been provided in Sections 3.5.6 and 3.16.6.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Avalon Paradea		<p>Concluding Thoughts Within the current draft EIS, each section ends with a summary account for each of the three Alternative Actions and the No Action Alternative. I find it strange that for nearly every section, the Full Retention summary contains a subsection that reads: "Potential Mitigation Measures: None recommended." Most of these topics detail environmental concerns that ought to be addressed with mitigation measures. Why do most of these have no such recommended measures? What is the point of including this subsection if no mitigations are outlined, especially in cases where the preceding Summary of Impacts admits to such things as "continued long-term, minor, adverse impacts" (as seen in the Biological Resources section)? This is confusing to me. ??</p>	<p>The EIS has been revised to clarify and distinguish ongoing impacts and management measures (due to continuation of ongoing activities) and potential new impacts and mitigation measures (due to administrative action of continuing or ending ongoing activities and implementing connected actions).</p> <p>Ongoing management measures (or mitigation measures previously committed to and/or required by Record of Decision, Finding of No Significant Impact, or Biological Opinion) added to EIS appendix, discussed in Existing Conditions, and referenced in "Potential Mitigation Measures" summary as "existing management measures."</p>
Avalon Paradea		<p>Going forward, the Army ought to take the following suggestions into consideration: • Make fire data accessible to researchers and the public. • Allow independent scientists to investigate potential causes of concern such as pollutants, water quality, and soil health. • Thoroughly remove existing debris within all retained land, including the State-leased land, regardless of age or origin. • Allow Kānaka ʻōiwi full access to this ancestral landscape, once debris and UXOs have been safely removed. Regardless of whether these recommendations are properly implemented, I strongly believe that the Army is ill suited to retain any degree of control over the State-owned lands once the lease expires in 2029. I look forward to seeing these lands return to the State at the end of this decade, with the hope for better management in the future. E ola Pōhakuoloa, may this phenomenal ʻāina experience improved health and continued growth in the years to come.</p>	<p>Wildland fires are discussed in Sections 3.3.4.4 and 3.16.4 of the EIS. Water quality, soils, and pollutants are discussed in Sections 3.9.4, 3.8.4, and 3.5.4.</p> <p>In accordance with the lease and under the provisions of existing law, the Army retains responsibility for cleanup and restoration of former training areas. After the lease expires, the Army would follow Army regulations to determine how and when the cleanup and restoration of State-owned land not retained would occur, following the CERCLA process.</p>
Travis Paradea		<p>just like her. I'm just a haole guy from Kona. But that being said, I could wax up here for a little while. Aloha. You know, we talk about the value of Hawaii to the U.S. military and U.S. national security, I don't think we should be having any conversation about what Hawaii has to sacrifice for that, as opposed to what Hawaii has already given. Right? So these lands up here are cultural lands of the ancestors of veterans of the U.S. Hawaiians have fought in the war of 1812, both for and against the U.S. They fought on both sides of the U.S. Civil War. I think they fought in pretty much every major American conflict since that. So this is not just like that place between Hilo and Kona. And that's kind of issue. Once upon a time Kaho'olawe was that island between Hawaii Island and Maui. But as people learned more about it, they got out there, they found out what was on that island they changed it. Right now we understand. Right now, I would imagine the vast majority of people at Hawaii Island have no idea what's up there in any part of Pohakuoloa. Not just the parts that's up for release or not, but the whole place. So it's kind of hard for us to understand its importance without that information coming out. So to get to the point, which is the environmental impact statement. Statements like this one here on water resources. Continued adverse impacts on water resources for ongoing activities, impact would be less than significant. That is what you call obfuscation, I think, in general, right? There is very little specifics on what's up there, because when you become specific on what's up there, people will not want to see it go back to being a target for target practice. Especially for water resources.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Travis Paradea		<p>You know, I mean, I'm surprised it hasn't been brought up yet, but I understand the Army conducted a water resource survey up there that made them realize the water table is much higher than it is. That the water table supports more than we thought. That is a relatively recent survey. I'm sorry I don't have the time on that or when that happened. I thought it was funny going through previous understandings about Pohakuloa Training Area and releasing these lands, and we hear a lot about the uranium but nothing about all of the land, which I feel like is a topic worthwhile discussing, as well. But, yeah, I support giving no land back over after this lease. I have a hard time believing that that 23,000 acres will somehow prevent maneuvers on what is still the 110,00 acres of exercise land. Mahalo.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Dustin Paradis		<p>The U.S. military has abused the natural environment on every island in the Hawaiian archipelago ; one of the most disgusting being the desecration and destruction of Kaho'olawe and one of the more recent being the Red hill fuel tanks on Oahu. They US military cannot be trusted to respectfully use and remain in good standing with the terms in their lease agreement. I support the lease agreement to lapse, be nullified, and to no longer allow military exercise nor access in this area.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Eric Paul		<p>I am submitting a comment in opposition to the lease renewal for the Pohakuloa Training area. I believe this area should be converted back to use for the Hawaiian people, and cleared of military presence.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Stephen Paulmier		<p>Aloha. Environmental impact statement. Draft environmental impact statement. The word that comes to me is disingenuous. I have a lease. I'm a renter. I live in Kea'au. My landlord expects certain things from me. When I leave his place, he's a much older man than myself, so I will have to leave some day when he passes. If I were to leave my apartment the way you are leaving Pohakuloa, his family would be hard pressed. I don't know if any of you have ever rented anything for yourself, but you are asking the people of this land to extend a lease that in your environmental impact statement you haven't owned up to what you've done there. There is no plan for cleaning it up. There has been no effort to guarantee a cleanup.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Stephen Paulmier		<p>When I attended the Nuclear Regulatory Commission hearings about the DU, I made the analogy between a drunk asking a judge to give him his driver's license on the condition that he would be allowed to keep drinking while driving. And that's basically what you asked us. You said -- you didn't say you lied, although you did, about the DU. But you said let us have it anyway. Shame. Shame. And now you expect us to accept an impact statement that doesn't include any honesty at all. No admission of what you have done. No humility at all. And yet we're supposed to consider this something legit? It's disingenuous. Aloha. It has something to do with respect and respect for yourself. To respect yourself you must be honest, and honesty requires humility, courage. Please, I ask you and I'm telling you these people, this aina, which includes the people, will not extend the lease. You've already done too much. Aloha.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Stephen Paulmier		<p>The 133,000-acre Military Toxic Area (PTA) is located in the center of Hawai'i Island at an elevation of 6500 feet. It's an area that has been bombed and abused by all branches of the US military for more than 70 years. Millions of live-rounds are fired annually at PTA. A wide range of toxins, including Depleted Uranium (DU) radiation, have been spread throughout the land. All of us on Hawai'i Island, residents and visitors alike, people, plants and animals, are downhill and downwind from PTA.</p> <p>Of the 133,000-acres at PTA, the military wants to renew a State lease of 23,000 acres. The bulk of the land at PTA, more than 84,000-acres were simply seized by a presidential executive order. The conditions of any lease are predicated on the treatment of the property leased and the condition that property is returned to at the end of the lease. The present lessee has taken no action or made no plan to even access the damage done as a result of its use and abuse of the land. It's EIS is, itself an indictment of the lack of responsible stewardship on the part of the lessee.</p> <p>I say NO to any lease renewal. I say yes to require a comprehensive independent assessment of the toxic military mess at PTA, guaranteed federal funds to do a thorough clean up, and the shut down and return of the entire 133,000-acres to the Hawaiian people. The behavior of this lessee shames us all! The most severe sanction would not do justice to the pattern of abuse that is evidenced here. Bombing the aina is the ultimate desecration.</p>	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Tom Penny		<p>Hi, it's Tom Penny. T-O-M, P-E-N-N-Y. Thank you for all of your fine speeches. Very moving. I had a friend who worked at the Pohakuloa Training Station as a civilian making pizzas for the people who were stationed up there. So he asked me one day, he said, "Tom, have you ever heard of the million dollar minute?" And I was like, "The what?" He said, "It's called the million dollar minute." And I said, "No. What are you talking about?" And he said that at the year's end, calendar year, fiscal year, whatever it is, if there is leftover ordnance, just strictly for the purpose of making sure the budget was there the next year, they blew it all up in one day. A million dollars worth of ordnance, all used in a day -- or should I say, in a minute, which is why it's called the million dollar minute. And by extension, I just went into, oh, my God. Our tax dollars at work. You know, you are going to blow up a million dollars of ordnance in one minute just so your budget will match the one that you had, the one before, or even get raised to a higher level. I was stunned, and I thought, hum, yeah, roads, hospitals, public transportation, anything but that. Thank you.</p>	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Tom Penny		<p>My name is Tom Penny. P-E-N-N-Y. First name Tom, T-O-M. I would like to go on record as opposing a renewal of the lease for the state land up in Pohakuloa. I think, you know, with due respect to the military, the continued bombing of land just never has set well with me. I have been a member of the community here for 42 years. Prior to that I was on O'ahu, and I remember distinctly the occupation by hawaiians of Kaho'olawe. I think that stands as an example of people standing up and saying, enough is enough, really. I mean, how often can you drop bombs on land without it having a deleterious effect on people's health, the welfare of our community, and the continued peace and safety of our community. So I do have a proposal for -- well, let me comment first on the EIS. EIS, it is so well worded to help the military get across the idea that they are doing a great thing up there, and I don't believe it. I just, every time I read the praises and how it's put, I'm just like, oh, this is articulation all geared to making it seem like the greatest thing in the world. Well, it's not. Bombing land is never good. So I have a suggestion. I would like to see the release -- the lease not renewed, and I would like you to take the next seven years to clean the mess up that you have made. That's all I have. Thank you,</p>	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Crystal Pitts		Enough is enough! The military has hurt Hawaiian lands and its people too much already. We all want you to stop now. The military obviously is not here to protect the people but to take and poison them. What's worse having someone else do it or our own Military in which we are supposed to rely on. Too many Native Hawaiians are already being pushed out and getting their land sold & bought out by foreigners. The military need to start correcting all the wrongs they have done here in Hawaii NOT desecrating even more. This is disgusting. SHAME ON THE MILITARY	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Tara Plachowski		As a resident of Hawai'i and Kamuela I experience the impact of the military at Pohokuloa first hand. This is a sacred space that should not be occupied by military. The occupation has had significant impact on native bird species. The area should be maintained as a bird and wildlife sanctuary and stewarded by kanaka dedicated to preserving the aina and our native species.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Sherry Pollack		I urge you to stop bombing Pohakuloa and end the State lease. Pohakuloa has been actively bombed and used for artillery practice for over 6 decades and as a result become a military toxic waste dump. Enough is enough. The cumulative impacts to the air, ground, and water of all the toxins used at PTA need to be addressed and cleaned up. End the lease. Stop the contamination now.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Ethan Porter		This EIS is not acceptable to the regular population of the state of Hawaii or the island of Hawaii at large. Please stop using live fire in our home.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
John Powell		Aloha, I fully support the military extending there lease for training. The military needs the training area to be able to defend our nation. Because if the size and different terrain our troops can be fully prepared. The military has helped many people by being here. There fire department and medical personnel have helped many in the area. Also they aided in fighting fires with personnel and equipment including helicopters. The good they have done along with the financial aspect far exceeds the negatives. Please renew there long term lease. Mahalo John Powell Kailua-Kona	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
John Powell		Aloha, I fully support the military extending there lease for training. The military needs the training area to be able to defend our nation. Because if the size and different terrain our troops can be fully prepared. The military has helped many people by being here. There fire department and medical personnel have helped many in the area. Also they aided in fighting fires with personnel and equipment including helicopters. The good they have done along with the financial aspect far exceeds the negatives. Please renew there long term lease. Mahalo John Powell Kailua-Kona	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Michael Reimer		What is obviously missing is a superior and comprehensive alternative. It is one that could meet all criteria required for military training and would incorporate the best of several listed alternatives. Most essential elements are available and mentioned in various other alternatives but the draft EIS fails to combine them into a reasonable working alternative. This avoidance then tends to force acceptance toward the preconceived preferred alternative by intentionally providing flawed alternatives. ?	The EIS analyzes a range of reasonable alternatives. The preferred alternative (see Section 2.4) or the alternative selected for implementation in the Record of Decision could include a combination of Alternatives 1, 2, and 3.

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Michael Reimer		<p>The major reason giving concern for significant negative impact is that the EIS states the Army would no longer have access to the impact areas and training ranges south of the State-owned land. That, it claims, would severely constrain the Army's ability to maintain and monitor that land and therefore there would be new significant impacts on protected species on U.S. Government-owned land that could no longer be accessed. This singular reason therefore leads to the conclusion that, "in total, the impact would be significant." Frankly, this is bogus and flies in the face of logic, reason, and common sense. Of course the Army will have access to the land south of the State-owned land and they can still continue to use the U.S. Government-owned land for training activities. There is no reason what the U.S. Army does to currently address biological resources on U.S. Government-owned land cannot be continued. ?</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Michael Reimer		<p>This is an opportune time to discuss a common reason continuously given by the draft EIS that claims significant negative impact for many resource evaluations. That reason is lack of access between U.S. Government-owned parcels that the state- owned land currently provides. The draft EIS notes on many occasions that the Army would enter into negotiations or consultation with various entities to clarify or to provide some continuing action to address resources if the No Action alternative is chosen. In fact, such a consult is given in section 3.3.6.4 for this No Action Alternative for biological resources. "The Army would need to re-initiate consultation with USFWS regarding the BO conservation measures for this area ." The Army simply needs to negotiate with the state right-of-way passage through some of the State-owned land to allow access to various U.S. Government-owned sites. For example, a limited right-of-way corridor could be established in training areas 17 and 18 to connect Ke'amuku and the Impact Area-Training Area parcels. Figure 2.4 for Alternative 3 shows connectivity also is possible through training areas13 and 14 for these two parcels. Similarly, a limited right-of-way passage could be negotiated for connectivity between the Cantonment parcel and the Impact Area-Training Ranges through training area 5. These suggestions can be graphically seen in Figure 2.4 for Alternative option 3. Further, sections of the Old Saddle Road and the Daniel K. Inouye highway provide access between the containment area and Ke'amuku and within a few hundred feet of the impact area and training ranges. ?</p>	<p>Under the No Action Alternative, the Army would have no land retention estate for the State-owned land, including easement (right to use or travel over the land of another). Alternatives 1, 2, and 3 could include a variety of land retention estates, including easement. Section 2.2.5 describes Alternative 4, "Retention of Only Access, Utilities, and Infrastructure," and reasons why this alternative does not meet elements of the Army's purpose and need and does not fully meet screening criteria 1, 2, 4, and 5.</p>
Michael Reimer		<p>In short, the failure of the draft EIS to even consider these simple, common sense inclusive options for the No Action Alternative reveals absolute bias and a blatant attempt to surreptitiously reject the No Action Alternative. In reality, the No Action Alternative has no less negative impact for Biological Resources than any other option and, for most reasons provided, it is beneficial impact (Table ES-1). In fact, all other action alternatives should be downgraded as they cause significant harm as noted in section 4.4.2, "Biological resources management programs at PTA have been beneficial; however, increased risk of wildfires, caused by training activity, have destroyed individual plants and have altered habitat, preventing recovery of some native species." ?</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Michael Reimer		<p>The positive effect on impact in the No Action Alternative is even extended beyond Biological Resources as noted in Section 3.11.6.4. "Biological Resources Section 3.3 does not identify any adverse impacts to populations including low-income or minority populations. Because there would not be impacts to populations, there would be no impact on environmental justice under the No Action Alternative." That in itself should upgrade the No Action Alternative for Environmental Justice from less than significant impact to at least no impact as stated in this discussion. That makes the No Action alternative option superior to all other alternatives for the Environmental Justice resource.</p>	<p>"Less than significant" includes beneficial impacts, not just adverse impacts. No change necessary.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Michael Reimer		<p>These claims are largely unsupported by the discussion leading to this conclusion. It falsely states that there will be a total loss of activities on State-owned land. Yet in the Biological Resources discussion (4.4.2), the draft EIS states that there will be an increase in various recreational activities on the State-owned land including hunting. The land would also be available for extension of critical protected habitats. The cantonment area and impact area are still U.S. Government-owned property so there is no reason for there to be loss of ongoing activities in those sectors. Any suggestion that activities are degraded by loss of contiguousness is alarmist in that negotiations can be initiated to retain right-of-way connectivity passages, as previously presented. Any impact to the cantonment area can be offset by a contractor-supported relocation of the cantonment area and supporting utilities to U.S. Government-owned land. Because the U.S. Army seeks modernization and upgrading of cantonment facilities, this would most probably be a more cost effective way to accomplish that goal and it would certainly be beneficial to the overall financial and economic impact to the County. In effect, it creates jobs in the civilian sector.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Michael Reimer		<p>The draft EIS also makes the statement in the No Action Alternative for socioeconomic discussion that, "the Army would no longer be able to provide community services that extend beyond the installation such as local firefighting support, local emergency services, and community relations events." This has the full appearance of a veiled threat that if the retention of the lease is not granted, then the U.S. Army will cease humanitarian support to the County. As the U.S. Army would be continuing training activities at PTA even without the continued total control of State-owned land, there is nothing in any of the alternatives that would require the cessation of continuing the civility of U.S. Army support for County residents. In fact, it should be noted that some fires at PTA are caused by U.S. Army activities and State resources are available to assist with those emergencies.</p>	<p>Section 3.10.6.4 revised with reasons why the Army would no longer be able to provide community services under the No Action Alternative, including loss of electrical power and potable water (as noted in Section 2.2.4).</p>
Michael Reimer		<p>Because the use of PTA for training will be continued, other economic impacts are negligible. For example, when troops are detailed to PTA for training under austere conditions, they do not use local residential facilities. Permanent and civilian employment will be continued as the training continues unless it, too, will be used as a threat to force lease extension. There were not specific instances detailed in the draft EIS of any significant training operation that would have to be curtailed because of the loss of the State-owned land out of U.S. Army control so it is reasonable to presume there would be no change in impact. In Hawaii County, the U.S. Army supports 1962 employees with 120 civilians employed at PTA. This is only 2.3 percent of the 88,098 employed in the County (Section 3.10.4), but it is not known if all of these are full time positions. In that same section, the draft EIS states "troops training at PTA are housed in troop billeting (i.e., Quonset huts) within the Cantonment of the installation;" There is, therefore, no housing economic impact to the County even if training is reduced. The cantonment area remains on U.S. Government-owned land.</p>	<p>Examples of ongoing activities that would need to cease from loss of State-owned land have been incorporated into Section 3.10.6 of the EIS.</p>
Michael Reimer		<p>Therefore the concluding claim, "Overall, that impact would be significant and adverse," for the Socioeconomics resource section of a No Action Alternative is unsupported by the discussion of the three criteria used for evaluation 3.10.5). There is no substantial change in regional population or demographic distribution; there is no substantial change in local or regional economic indicators such as employment, spending or earning patterns; and there are no substantial indirect impacts on housing availability or public facilities.</p>	<p>Section 3.10.4 discusses that spending and earning patterns would be impacted by the No Action Alternative. The Army currently contributes \$92M in labor within the County of Hawai'i in addition to local expenditures such as local purchases of potable water, equipment, and other services such as solid waste disposal, porta johns, and custodial services</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Michael Reimer		As in previous discussions of conclusions suggesting significant adverse impacts, the draft EIS completely overlooks the obvious. The resolution is found in Alternative 3, minimum retention and access of 3.15.6.3. Basically, it says that the U.S. Army would “continue to use, access, maintain, and repair U.S. Government-owned utilities within the State-owned land but at moderately reduced levels. Likewise, use of non-U.S. Government-owned utilities within the State-owned land and U.S. Government-owned and non-U.S. Government-owned utilities in the U.S. Government-owned land would continue to occur but at moderately reduced levels.” Moderately reduced levels are not defined but it must be presumed that the access to the utilities would allow the utilities to remain functional. ?	<p>Alternative 3 includes continued Army maintenance and repair of U.S. Government-owned utilities on the State-owned land not retained to ensure their operability (see Section 2.2.3). Section 2.2.5 discusses Alternative 4 (retention of only access, utilities, and infrastructure); however, this alternative was eliminated from detailed study for not meeting several elements of the purpose and need statements and not fully meeting several screening criteria.</p> <p>The No Action Alternative would result in significant adverse utility impacts because loss of the PTA substation, which is on State-owned land, would eliminate HELCO-provided electricity throughout PTA.</p> <p>Section 3.15.6.3 revised to better characterize "moderately reduced levels" of utility use, maintenance, and repair.</p>
Michael Reimer		The modernization and improvements under the No Action alternative would occur on U.S. Government-owned land that will meet the 25-year requirement. It is reasonable to suggest that the same negotiation for continued maintenance could be applied to the No Action alternative for a minimal period after lease expiration, if needed. Such is probably not needed as the U.S. Army, noting its need for PTA to address rapid response to critical situations, could surely construct replacement utilities in less time than 7 years, including permitting and EIS preparation. ?	Section 2.2.5 discusses Alternative 4 (retention of only access, utilities, and infrastructure); however, this alternative was eliminated from detailed study for not meeting several elements of the purpose and need statements and not fully meeting several screening criteria.
Michael Reimer		By applying the same negotiated access for maintenance and repair to the current facilities as in other alternatives, this No Action alternative would have the same impact rating, less than significant. Specifically, the advantage is to the U.S. Army as it would have the opportunity for upgrading and maintenance of existing facilities on U.S. Government-owned land. ?	Section 2.2.5 discusses Alternative 4 (retention of only access, utilities, and infrastructure); however, this alternative was eliminated from detailed study for not meeting several elements of the purpose and need statements and not fully meeting several screening criteria.
Michael Reimer		PTA is not the only U.S. military base that provides the similar training opportunities as the 5 reasons given in this statement for retention (Table 2-2). Fort Carson, Colorado and its proximal training areas would provide similar training experiences. It has similar climate, similar winds and precipitation, adjacent mountains for high-altitude training experience, Butts Army Air Field (4,573-foot runway) similar to Bradshaw Air Field (3,700-foot runway) at PTA and nearby Peterson Air Force Base airfield for larger aircraft training as Ellison Onizuka Kona International Airport is now used. It is also of similar size, albeit 5,000 acres larger at 137,000 acres at PTA, but has the advantage of a proximal site of 235,000 acres, Piñon Canyon Maneuver Area, for additional training. In addition, it will not present the potable water and wastewater problems and expenses that PTA currently experiences.	Locations outside of the State-owned land at PTA do not address the Proposed Action (retention of the State-owned land), do not meet the screening criteria, and were previously considered (see Section 1.1.3).
Michael Reimer		PTA is used for training. It is not a military base for troops on standby for rapid deployment to regions of conflict with rogue regimes within the Indo-Pacific region. This distinction is intentionally blurred in the draft EIS. This is discussed in Section ES- 2 and ES-6. “The geographical location of Hawai’i is a strategic one for national defense and rapid deployment of military forces, and the island plays a key role within the U.S. Indo-Pacific Command area of responsibility to help achieve U.S. national security objectives and protect national interests. PTA is the only U.S. Army Major Training Area in Hawai’i, making it the U.S. Army’s primary ground maneuver tactical training area supporting home-station, joint, and multinational training in the State.” The response faction is stationed on O’ahu. Neither alternative 2, 3, No Action, or a combination would affect this deployment. ?	The statements are in reference to Hawaii being used for rapid deployment, not specifically PTA.

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Michael Reimer		<p>Although the U.S. Army brings up the issue of encroachment on their training lands, they already have in place effective mechanisms to deal with that concern. Section ES- 11 addresses this issue. “The Army would consider adding fencing and signage to minimize encroachment from adjacent non-U.S. Government-owned land (Alternatives 2 and 3).” This methodology could easily be extended for any alternative. It must be kept in mind that some encroachment threats to limiting training are caused by the Military’s own actions, such as threats posed by its own use of materials such as munitions, unexploded ordnance, and other toxins. Section 3.2.4.3 states “Encroachment stems from environmental (for example, noise, endangered species, cultural resources, unexploded ordnance [UXO], and munitions constituents [MC]), social (for example, urban sprawl), and economic (for example, changing land values) influences.” Simply, if the U.S. Army would clean up the toxic remnants after each training exercise, there would be less U.S. Government-owned land unusable contributing to this type of encroachment. ?</p>	<p>As noted in Section 3.5.4.11, soldiers are required to collect casings from spent rounds, wood boxes, and other solid waste debris generated during live-fire training and return them to the ammunition holding area and ammunition supply point for recycling or disposal, as appropriate.</p> <p>Sections 3.5 and 3.15 supplemented with relevant information from Pohakuloa Training Area Range Operations Standard Operating Procedures (2022) regarding cleaning ranges after training.</p> <p>In accordance with the lease and under the provisions of existing law, the Army retains responsibility for cleanup and restoration of former training areas. After the lease expires, if deemed necessary, the Army would follow Army regulations to determine how and when the cleanup and restoration of State-owned land not retained would occur, following the CERCLA process.</p> <p>Through the Army Compatible Use Buffer/Readiness and Environmental Protection Integration program, the Army works with various eligible entities (State conservation departments, universities, watershed protection organizations, land trusts, and other non-profit conservation-minded organizations) to enact a holistic encroachment management strategy that aims to prevent additional incompatible development, conserve native forests/habitat for threatened and endangered species, and bolster climate resilience adaptation and responsiveness.</p>
Michael Reimer		<p>An issue brought up in Section 2.1.2 is that only the State-owned land has soil suitable for maneuver exercises and provides the ability to dig and excavate survivability positions for personnel and equipment (USARHAW, undated). While the “bare lava that dominates much of the rest of PTA” would certainly provide the austere training challenges the U.S. Army says it needs for training (Section 1.3.3 ), there are other soil areas particularly on the U.S. Government-owned land of the Ke’āmuku parcel. The dominant soil area on State-owned land is the Ke’eke’e loamy sand Series. As denoted in the Soil Survey of the Island of Hawaii by the U.S. Department of Agriculture Soil Conservation Service (1973), the Ke’āmuku parcel contains large expanses of sandy loams in the Kilohana and Waikalua Series. Thus, soils suitable for survivability training are available on U.S. Government-owned land. ?</p>	<p>Locations outside of the State-owned land at PTA do not address the Proposed Action (retention of the State-owned land), do not meet the screening criteria, and were previously considered (see Section 1.1.3).</p>
Michael Reimer		<p>The draft EIS lacks a major critical component needed for discussion of lease alternatives, especially full retention consideration. That component is a fair value for the cost of the lease. The draft EIS states that PTA is the only land available for its training use in Hawaii (Section 1.3.3). That makes it a valued property. The simple economic principle of supply and demand gives added value to that property. Another consideration is that the use of the land by the U.S. Army is a taking in that it contributes to its destruction or secession for alternative uses. In effect, the U.S. Army is taking value from a land resource. This is considered by many states to be an extraction consideration, often applied to removal of resources of value, such as mineral or oil and gas removal. Fees or taxes are applied.</p>	<p>Section 2.3 describes the land retention estates available to the Army. EIS revised to provide potential impacts for retention via fee simple title and lease, assumed State conditions for lease, administrative requirements for a new lease (e.g., administrative rule changes), and note the potential impacts for easement and license are assumed to be the same as those for lease due to similar State conditions.</p> <p>EIS revised to include information related to ongoing best management practices, standard operating procedures, management measures, and mitigation measures to highlight ongoing environmental monitoring and conservation efforts (see Existing Management Measures added to resource areas in Section 3).</p>
Michael Reimer		<p>The draft EIS notes the facilities alone on State-owned land have a value of \$200 million (2.1.1). That can be used to determine a fair tax rate plus land use plus the extraction tax. At any rate, it is possible that the yearly total fees may be in a millions of dollars range. ?</p>	<p>Land retention negotiations, including compensation for use of the State-owned land, will be initiated following completion of the NEPA/HEPA process.</p>
Michael Reimer		<p>Fair value consideration must be included in the Socioeconomic resource cost and applied to any new lease action. This fair consideration of lease value is missing from the draft EIS determination of impacts. ?</p>	<p>Land retention negotiations, including compensation for use of the State-owned land, will be initiated following completion of the NEPA/HEPA process.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Michael Reimer		The following is a situation regarding cooperation with Native Hawaiian groups that the U.S. Army should engage now. It is found in ES.11. The U.S. Army states that it could undertake mitigation measures for actions other than full retention of the state-owned land in section ES-11. "The Army could propose mitigation measures to reduce the severity of adverse impacts from the Proposed Action. These potential mitigation measures are summarized below and in Table 3-25.	The Army has been and will continue to consult with Native Hawaiian Organizations on issues related to PTA.
Michael Reimer		I will address one toxin used by the U.S. Army at PTA. That is the use in training of weapons containing uranium; it is a heavy metal known to be toxic as well as a radioactive material. This is a highly controversial material in weapon use, not only because of the inhumane destruction it can cause with nuclear weapons, but also because the toxicity and radioactivity of the metal is often downplayed. Some of the referenced material in this section is found at that Nuclear Regulatory Commission (NRC) Adams Public Library, accessible on-line. Those references have a number starting with the letters ML.	<p>Section 3.5.4.12 of the EIS expanded with additional information about depleted uranium and associated studies at PTA (i.e., archival research, site reconnaissance, radiological instrumentation, soil sample results).</p> <p>Section 3.5.4.12 notes that the Army completed a 1-year airborne uranium monitoring program in 2009 to determine if depleted uranium has impacted local air quality. Total airborne uranium levels collected from 210 air samples at PTA were within the range of naturally occurring uranium in Hawaiian soils and rock and were several orders of magnitude below the U.S. and international chemical and radiological health guidelines; therefore, the depleted uranium has not impacted local air quality.</p> <p>Information regarding potential effects of the Proposed Action on depleted uranium is in Section 3.5.6.</p>
Michael Reimer		One would hope that a reviewer of methods and techniques would be familiar enough with this type of dodge that the approach is rather transparent. For a good example of this type of dodging, look at Section 3.5.4.1 regarding organic contaminants of concern including hydrocarbons. Sampling has shown the presence of contamination that exceeds DOH and U.S. EPA standards but "because the direct exposure pathways for groundwater are considered incomplete within the State-owned land, an EPC exceedance of the DOH EALs for protection of groundwater was not considered to pose an unacceptable risk to human health (USACE-POH & USAGHI, 2017b)." "Based on this result, TPH-DRO is not a COC at the sampled location."	The State of Hawaii Department of Health Hazard Evaluation and Emergency Response Office Technical Guidance Manual identifies exposure pathway assessment as an accepted method of determining environmental risk.
Michael Reimer		Uranium and its oxidized forms are toxic to humans. For a summary discussion see: <a href="https://wise-uranium.org/utox.html#:~:text=Inhalation%20of%20uranium%20for%20workers%20%28based%20on%20radiological,%20%20450%20%204%20more%20rows%20DU%20toxins%20are%20not%20confined%20to%20U.S.%20Government-owned%20land%20at%20PTA%20but%20can%20also%20impact%20State-owned%20land%20and%20surrounding%20farm%20and%20residential%20lands.%20The%20reason%20for%20this%20expanded%20area%20of%20contamination%20is%20that%20depleted%20uranium%20is%20subject%20to%20being%20formed%20into%20dust%20or%20aerosols%20that%20are%20readily%20transported%20in%20the%20air.%20This%20aerosolization%20can%20be%20accomplished%20very%20easily%20by%20oxidation%20and%20proximal%20projectile%20explosions%20from%20training%20and%20abrasion%20from%20wind%20and%20military%20vehicular%20traffic%20and%20foot%20traffic%20and%20rotor%20wash%20from%20helicopters%20and%20uptake%20by%20plants%20that%20are%20burned%20in%20fires%20that%20occur%20frequently%20at%20and%20near%20PTA%20and%20carried%20as%20component%20of%20the%20smoke.%20Once%20in%20particulate%20form%20it%20can%20also%20be%20resuspended%20into%20the%20air%20again%20and%20again%20after%20it%20is%20released%20from%20the%20original%20projectile.">https://wise-uranium.org/utox.html#:~:text=Inhalation%20of%20uranium%20for%20workers%20%28based%20on%20radiological,%20%20450%20%204%20more%20rows%20DU toxins are not confined to U.S. Government-owned land at PTA but can also impact State-owned land and surrounding farm and residential lands. The reason for this expanded area of contamination is that depleted uranium is subject to being formed into dust or aerosols that are readily transported in the air. This aerosolization can be accomplished very easily by oxidation, proximal projectile explosions from training, abrasion from wind, military vehicular traffic, foot traffic, rotor wash from helicopters, and uptake by plants that are burned in fires that occur frequently at and near PTA, and carried as component of the smoke. Once in particulate form, it can also be resuspended into the air again and again after it is released from the original projectile.</a>	<p>Section 3.5.4.12 includes references noting that the depleted uranium did not aerosolize upon impact and per DODD 4715.11 high explosive munitions are not permitted to be fired into the same area as the depleted uranium impact locations.</p> <p>Section 3.5.4.12 notes that the Army completed a 1-year airborne uranium monitoring program in 2009 to determine if depleted uranium has impacted local air quality. Total airborne uranium levels collected from 210 air samples at PTA were within the range of naturally occurring uranium in Hawaiian soils and rock and were several orders of magnitude below the U.S. and international chemical and radiological health guidelines; therefore, the depleted uranium has not impacted local air quality.</p> <p>Section 3.6.4 discusses fugitive dust monitoring for depleted uranium at PTA, which concluded that the depleted uranium has not impacted air quality at PTA or in the surrounding areas.</p> <p>"Nanometer-Micrometer Sized Depleted Uranium (DU) Particles In The Environment," Journal of Environmental Radioactivity, January 2020, references aerosolizing of depleted uranium penetrators. The depleted uranium spotting rounds formerly used at PTA were low velocity projectiles designed to produce a cloud of smoke; they were not penetrators (e.g., armor piercing ammunition, anti-armor rounds).</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Michael Reimer		<p>In this draft EIS, the amount of DU spotting rounds is listed as 30-100 rounds for each of four firing ranges, or a maximum of 400. That contrasts with the over 600 rounds given by former estimates at PTA by Cabrera, a contractor for the U.S. Army who found the firing and impact sites for Davy Crockett training, and the 2000 rounds required for troop qualification estimated by a former Hawaii Army Garrison commander at a Hawaii County Council hearing on the use of DU at PTA. The number of 714 rounds, the amount in the discovered shipping inventory, was used in various exposure calculations by the U.S. Army contractors (see Adams library ML15161A459). There is also evidence that additional DU was used in the dummy main warhead rounds as a photograph of a rear tail assembly taken by the contractor scoping for DU is shown to have color (yellow) suggestive of oxidized uranium (See Adams Library: ML092950352, photos 4-9 and 4-10). This would indicate that some dummy rounds contained DU rather than the fissionable enriched uranium warhead. That is consistent with the reasoning to use DU in the spotting rounds for trajectory similarity rather than a similar dense metal.</p>	<p>Section 3.5.4.12 revised to state that based on extensive archival research, only 716 M101 spotting rounds were allocated to Hawaii. Additionally, based on the archival research and field surveys, up to 400 depleted uranium spotting rounds were fired at PTA.</p> <p>Section 3.5.4.12 revised to state the M390 practice round contained a malleable iron ball (for weight) and high explosive material, but did not contain depleted uranium, as noted in "Archive Search Report On the Use of Cartridge, 20mm Spotting M101 for Davy Crockett Light Weapon M28, Schofield Barracks and Associated Training Areas, Islands of Oahu and Hawaii, May 2007".</p> <p>Section 3.5.4.12 expanded with additional information about depleted uranium and associated studies at PTA (i.e., archival research, site reconnaissance, radiological instrumentation, soil sample results).</p>
Michael Reimer		<p>The draft EIS states in section 3.5.4.12 that "The spotting rounds did not aerosolize upon Army Training Land Retention at Pōhakuoloa Training Area Draft Environmental Impact Statement 3-81 impact (NDCEE, 2008; USACE-POH &amp; USAG-HI, 2017a)." This is propagation of a falsehood. I know of no study that was done to show that spotting rounds when exploding or impacting with the basalt rocks at PTA do not aerosolize. There are numerous studies that show DU shells aerosolize when impacting hard targets and basalt is certainly a hard material. A recent reference to this aerosolization upon impact of DU munitions is found at: <a href="https://www.sciencedirect.com/science/article/pii/S0265931X19304722">https://www.sciencedirect.com/science/article/pii/S0265931X19304722</a>. It is a peer-reviewed article by Ole Christian Lund and others in the <i>Journal of Environmental Radioactivity</i>, volume 211, January 2020. It is entitled "Nanometer- micrometer sized depleted uranium particles in the environment." It describes studies of aerosolization on impact of DU munitions and even aerosol production from DU burning at an ammunition depot in Kuwait. The authors state, "Later studies have largely supported that the DU penetrators on impact will disintegrated (sic) into particles with size within the respiratory fraction ( Cheng et al., 2009 ; Danesi et al., 2003 ; Salbu et al., 2003b , 2005b ). Thus, resuspension and subsequent inhalation should be a pathway of concern."</p>	<p>Section 3.5.4.12 includes references noting that the depleted uranium did not aerosolize upon impact and per DODD 4715.11 high explosive munitions are not permitted to be fired into the same area as the depleted uranium impact locations.</p> <p>Section 3.5.4.12 notes that the Army completed a 1-year airborne uranium monitoring program in 2009 to determine if depleted uranium has impacted local air quality. Total airborne uranium levels collected from 210 air samples at PTA were within the range of naturally occurring uranium in Hawaiian soils and rock and were several orders of magnitude below the U.S. and international chemical and radiological health guidelines; therefore, the depleted uranium has not impacted local air quality.</p> <p>Section 3.6.4 discusses fugitive dust monitoring for depleted uranium at PTA, which concluded that the depleted uranium has not impacted air quality at PTA or in the surrounding areas.</p> <p>"Nanometer-Micrometer Sized Depleted Uranium (DU) Particles In The Environment," <i>Journal of Environmental Radioactivity</i>, January 2020, references aerosolizing of depleted uranium penetrators. The depleted uranium spotting rounds formerly used at PTA were low velocity projectiles designed to produce a cloud of smoke; they were not penetrators (e.g., armor piercing ammunition, anti-armor rounds).</p>
Michael Reimer		<p>The earlier reference, NDCEE, 2008, quoted by the draft EIS is a commentary on DU at PTA by Professor Ken Rubin at the University of Hawaii. It includes no references to other publications. He makes a statement that it is unlikely that DU aerosolizes during firing but then goes onto say that "Rupture or fragmentation of the M101 spotting round during impact would have exposed DU fragments to the environment. These fragments would subsequently oxidize and further disaggregate at a rate that depended on the specific environment where they were used." This later comment by Professor Rubin noting DU could oxidize and aerosolize was conveniently ignored by the draft EIS.</p> <p>In effect, it is dominantly the oxidized DU form that aerosolizes. Oxidized DU typically ranges in color from black to greenish yellow to a yellow color and that has been seen on Cavy Crockett munition fragments located at PTA (contractor reports Cabrera Report, July 24, 2009, Adams library ML092950352) so it is obvious that DU does oxidize in the PTA environment.</p>	<p>Section 3.5.4.12 revised with a more complete summary of the conclusions of "Depleted Uranium, Natural Uranium and Other Naturally Occurring Radioactive Elements in Hawaiian Environments," <i>National Defense Center for Environmental Excellence</i>, 2008.</p> <p>Section 3.5.4.12 includes references noting that the depleted uranium did not aerosolize upon impact and per DODD 4715.11 high explosive munitions are not permitted to be fired into the same area as the depleted uranium impact locations.</p> <p>Section 3.5.4.12 notes that the Army completed a 1-year airborne uranium monitoring program in 2009 to determine if depleted uranium has impacted local air quality. Total airborne uranium levels collected from 210 air samples at PTA were within the range of naturally occurring uranium in Hawaiian soils and rock and were several orders of magnitude below the U.S. and international chemical and radiological health guidelines; therefore, the depleted uranium has not impacted local air quality.</p> <p>Section 3.6.4 discusses fugitive dust monitoring for depleted uranium at PTA, which concluded that the depleted uranium has not impacted air quality at PTA or in the surrounding areas.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Michael Reimer		<p>Although an inquiry had been made by the author of these comments to the draft EIS, there was not a response as to the location of these fragments today. Removal would have required the Nuclear Regulatory Commission (NRC) approval and it is not clear that such permission was ever given. This problem should be addressed before any decision is made on lease renewal consideration. ?</p>	<p>Section 3.5.4.12 clarified to indicate surveys found no indication of depleted uranium-containing materials on the State-owned land.</p> <p>The location and disposition of depleted uranium fragments outside of the State-owned land is beyond the scope of the EIS; however, the EIS does note the locations of the Davy Crockett ranges.</p>
Michael Reimer		<p>Another use of disinformation in this draft EIS to favor the preferred retention of the lease of State owned land at PTA is the claim that sampling of air particulates has not found any DU. The draft EIS relies on a conclusion based on air sampling during 2009. The report is found here: <a href="https://home.army.mil/hawaii/application/files/5815/5961/1869/mar10.pdf">https://home.army.mil/hawaii/application/files/5815/5961/1869/mar10.pdf</a> The sampling was conducted at three sampling locations in March 2009. The analysis for particle collection was only for uranium and not depleted uranium. It was not conducted during periods of high explosive training in the Davy Crockett impact areas. Thus, the sampling and analytical methods were selected to not find DU.</p> <p>A similar sampling and analytical design to not find DU is in place for monitoring soil collected at PTA that has been approved by the Nuclear Regulatory Commission (NRC). This program was spoon-fed to the NRC to approve but lacked specific descriptions of the analytical method and the sampling site location. Because the NRC bought into the program trusting the military to do what is right, the draft EIS now presents comments that suggests concurrence. Ideally, the site would be a repository for soil that was carried downstream from the DU impact sites. That site selection was based on balderdash. First, the site is over 5 miles away from the impact sites, predominantly on U.S. Government-owned land, and there is no connection of drainage system from the impact sites to the collection site. There are several lava berms in the way that would prevent any direct sediment-carried flow. Second, this draft EIS notes in that the rock base at PTA is highly permeable for surface water so it is highly unlikely that any sediment transport from the impact areas would reach the distant sampling site (3.5.6.1 and 3.9.4.3 citing report by Mitsunaga, 2010).</p>	<p>Section 3.6.4 notes that the fugitive dust samples were tested for total uranium, which includes depleted uranium. Section 3.5.4.12 notes that per DODD 4715.11 high explosive munitions are not permitted to be fired into the same area as the depleted uranium impact locations.</p> <p>The sampling locations and analytical design in the NRC-approved Safety and Environmental Radiation Monitoring plans are beyond the scope of the EIS.</p>
Michael Reimer		<p>Third, the selected definition of the criteria to state whether DU was present in the soil samples is unreasonably selected. It would require the uranium concentration in the sample to contain over 60 percent DU. The analyses of some samples have shown probable DU presence of up to 30 percent. This presence in the soil samples collected is most probably from airborne transport and deposition rather than sediment transport. Nonetheless, the presence of DU is indicated by the uranium isotope ratio. It is denied because it does not fit the high bar definition selected by the military. The military definition of the presence of DU is that the uranium of a sample must contain at least 50 percent uranium as DU (see Adams library 15161A459). The U.S. Army acknowledges that this definition is fraught with great uncertainties with the analytical method chosen. There are other more definitive detection methods available but that could more likely find DU and that is not the objective of the U.S. Army. It is highly unlikely that nanometer or micrometer diameter aerosols of DU oxides would be in sufficient quantity to equal the natural uranium concentration in a 200-gram sample of soil or sediment, but they would still be there and could be respirated if they become airborne. The issue of sediment sampling and the conclusion that it indicates no transport of DU at PTA is unquestionably ludicrous when such requirements for the definition of DU presence are deliberately designed.</p>	<p>The sampling locations and analytical design in the NRC-approved Safety and Environmental Radiation Monitoring plans are beyond the scope of the EIS.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Michael Reimer		<p>The U.S. EPA follows a model for exposure that says exposure to any form or level of ionizing radiation increases health risks. This is called a linear-no threshold model. Such exposure can come from medical procedures such as x-rays and injections with radioactive dyes, to flying, to living at higher altitudes. These seem to be minimal exposures. It is reasonable to ask then, what is your exposure to inhalation of an oxidized DU particle as small as one micrometer in diameter. Such a particle might contain as many as 300 million uranium atoms, much more by a factor of millions than contained in a basalt particle of the same dimension. DU oxides are also more insoluble so they can reside in your lungs for decades. The International Atomic Energy Agency says, "The size of the uranium aerosols and the solubility of the uranium compounds in the lungs and gut influence the transport of uranium inside the body. Coarse particles are caught in the upper part of the respiratory system (nose, sinuses, and upper part of the lungs) from where they are exhaled or transferred to the throat and then swallowed. Fine particles reach the lower part of the lungs (alveolar region). If the uranium compounds are not easily soluble, the uranium aerosols will tend to remain in the lungs for a longer period of time (up to 16 years), and deliver most of the radiation dose to the lungs." See: <a href="https://www.iaea.org/topics/spent-fuel-management/depleted-uranium">https://www.iaea.org/topics/spent-fuel-management/depleted-uranium</a>. ?</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Michael Reimer		<p>There is a principle regarding radiation exposure noted by many federal agencies including the U.S. EPA and the Nuclear Regulatory Commission (NRC). It is called ALARA. As defined in Title 10, Section 20.1003, of the Code of Federal Regulations ( 10 CFR 20.1003 ), ALARA is an acronym for "as low as (is) reasonably achievable," which "means making every reasonable effort to maintain exposures to ionizing radiation as far below the dose limits as practical, consistent with the purpose for which the licensed activity is undertaken, taking into account the state of technology, the economics of improvements in relation to state of technology, the economics of improvements in relation to benefits to the public health and safety, and other societal and socioeconomic considerations, and in relation to utilization of nuclear energy and licensed materials in the public interest."</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Michael Reimer		<p>Perhaps the best example of using a model to determine risk from DU should come from the U.S. Army's own calculations. This example comes from the NRC Adams Library document ML15161A459. A contractor for the U.S. Army (Morrow, J.W., 2008, Potential air quality impacts of aerosolizing M101 spotter rounds at Pohakuloa Training Area, Honolulu, Hawaii), considered several scenarios and made several determinations of the amount of DU aerosols that might be released by nearby High Explosives. The U.S. Army notes the contractor's highly conservative scenario resulted in a DU activity in air of an amount 50 percent greater than the NRC effluent standard. One issue of relevance to note is that the model used soluble uranium for the calculation, definitely not a conservative factor. The U.S. Army backtracks and suggests that model was too conservative and quickly adopts a less conservative scenario so that the NRC standard is not exceeded. It claims the DU air concentrations "are authorized by law and will not endanger life or property or the common defense or security." I am sure not many people would be thrilled to know that their exposure to toxic material is authorized by law. This brings up an interesting issue that people are then unwitting participants in an experiment to subject them to DU exposure, a point presented by Dr. Lorrin Pang, MD, MPH, who suggests that permission is required by international accord to participate in such studies ( <a href="https://vimeo.com/19153948">https://vimeo.com/19153948</a> ).</p>	<p>Section 3.5.4.12 notes that per DODD 4715.11 high explosive munitions are not permitted to be fired into the same area as the depleted uranium impact locations.</p> <p>Section 3.5.4.12 notes that the Army completed a 1-year airborne uranium monitoring program in 2009 to determine if depleted uranium has impacted local air quality. Total airborne uranium levels collected from 210 air samples at PTA were within the range of naturally occurring uranium in Hawaiian soils and rock and were several orders of magnitude below the U.S. and international chemical and radiological health guidelines; therefore, the depleted uranium has not impacted local air quality.</p> <p>Section 3.6.4 discusses fugitive dust monitoring for depleted uranium at PTA, which concluded that the depleted uranium has not impacted air quality at PTA or in the surrounding areas.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Michael Reimer		<p>Another enigma of the U.S. Army's attempt to downplay the exposure comes from the fact that it claims that not all DU spotting rounds have aerosolized because one was found mostly intact at PTA. So, by extension of that singular observation, the amount of DU available for airborne inhalation is minimal. Yet, the contractor scoping surveys specifically designed to find the DU spotting rounds at PTA have found evidence of only three or four rounds. The draft EIS never explains where might be the other intact rounds.</p> <p>The Code of Federal Regulations 10 CFR 20.1301 not only sets the limit of exposure to the public from a licensed source of radiation but also requires monitoring or calculation of possible exposures. The U.S. Army also states it will not conduct any air sampling. The U.S. Army chose the calculation pathway. It convinced NRC to agree to that choice. Naturally, by not making measurements, it cannot demonstrate compliance with the dose limits for individual members of the public as required in subpart 20.1301. This falls into the category of avoiding problems because 'if you do not look, you will not find.' There are certainly available more sophisticated analytical techniques that could determine the presence of DU in the uranium analyses, but that increases the risk of finding it. The important thing to remember is, it is the inhaled particles that put you at risk. Those respirable-sized particles can be carried hundreds of feet into the air from plumes resulting from a high-explosive detonation and transported scores of miles, especially in wind-driven turbulent air. A confirmed example of such airborne DU transport is found in: Lloyd, N. S., Chenery, S. R. N. &amp; Parrish, R. R. 2009. The distribution of depleted uranium contamination in Colonie, NY, USA. Science of the Total Environment , 408 (2), 397-407. ?</p>	<p>The Davy Crockett ranges are managed in accordance with the Nuclear Regulatory Commission license and approved Safety and Environmental Radiation Monitoring plans, as noted in Section 3.5.4.12.</p> <p>Section 3.5.4.12 notes that the Army completed a 1-year airborne uranium monitoring program in 2009 to determine if depleted uranium has impacted local air quality. Total airborne uranium levels collected from 210 air samples at PTA were within the range of naturally occurring uranium in Hawaiian soils and rock and were several orders of magnitude below the U.S. and international chemical and radiological health guidelines; therefore, the depleted uranium has not impacted local air quality.</p>
Michael Reimer		<p>In Section 3.5.4.12, the military makes the statement that "If the land use of the DU ranges remains military, DU cleanup is not necessary." This statement reveals their callous approach to toxins in general that the U.S. military has toward health and safety of soldiers and civilians. A condition of any lease renewal action must require immediate cleanup of training debris.</p>	<p>Section 3.5.4.12 clarified to indicate surveys found no indication of depleted uranium-containing materials on the State-owned land.</p> <p>Section 3.5.4.12 notes that the Army completed a 1-year airborne uranium monitoring program in 2009 to determine if depleted uranium has impacted local air quality. Total airborne uranium levels collected from 210 air samples at PTA were within the range of naturally occurring uranium in Hawaiian soils and rock and were several orders of magnitude below the U.S. and international chemical and radiological health guidelines; therefore, the depleted uranium has not impacted local air quality.</p> <p>In accordance with the lease and under the provisions of existing law, the Army retains responsibility for cleanup and restoration of former training areas. After the lease expires, if deemed necessary, the Army would follow Army regulations to determine how and when the cleanup and restoration of State-owned land not retained would occur, following the CERCLA process.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Michael Reimer		<p>In a document Programmatic Approach for Preparation of Site-Specific Environmental Radiation Monitoring Programs, attachment 8 specifically asks the NRC not to require air sampling during U.S. Army use of high explosives (HE) in the RCAs. The RCAs are the impacts areas of the Davy Crockett spotting rounds. Although there is a Department of Defense directive 4715.11 (2004) that prohibits the use of high explosives in the DU zones, there is an exception that it is allowable for national security objectives. There is no confirmation in this draft EIS that high explosives have not been used in DU zones or will not be used. The reference to the directive is apparently made as a deflection of the facts.</p> <p>There is the statement claiming that DU is 40 percent less radioactive than natural uranium. That is true only for a split second after DU has been purified from natural uranium; within 6 months, the activity of the DU due to the ingrowth of radioactive progeny has increased about half as much as the original decrease (<a href="https://www.wise-uranium.org/rup.html">https://www.wise-uranium.org/rup.html</a>). Such a claim without clarification is designed to intentionally mislead.</p>	<p>Section 3.5.4.11 notes that the migration of munitions constituents at PTA is limited due to limited surface water and groundwater pathways because of low rainfall, lack of perennial streams, and the deep depth to the groundwater aquifer.</p> <p>Section 3.5.4.12 has been updated to reflect additional information about the qualities of depleted uranium, the firing of munitions into the depleted uranium impact locations, and associated studies at PTA (i.e., archival research, site reconnaissance, radiological instrumentation, soil sample results).</p> <p>Section 3.5.4.12 includes references noting that the depleted uranium did not aerosolize upon impact and notes that per DODD 4715.11 high explosive munitions are not permitted to be fired into the same area as the depleted uranium impact locations. PTA does not fire high explosive munitions in the depleted uranium impact locations.</p> <p>Section 3.5.4.12 notes that the Army completed a 1-year airborne uranium monitoring program in 2009 to determine if depleted uranium fragments have impacted local air quality. Total airborne uranium levels collected from 210 air samples at PTA were within the range of naturally occurring uranium in Hawaiian soils and rock and were several orders of magnitude below the U.S. and international chemical and radiological health guidelines; therefore, the depleted uranium fragments have not impacted local air quality.</p> <p>The Army has conducted the following actions with respect to depleted uranium at PTA: 1) soil sampling, 2) air sampling, 3) a health and risk assessment, 4) implementation of DODD 4715.11, and 5) obtain and adhere to a NRC license for possession of depleted uranium.</p>
Alina Reyes		<p>The army's use of Pōhakuloa as a training ground guarantees the destruction of the beautiful nature of the islands. Not only does this nature serve the natives and locals as a resource and home, but those who visit the islands. To desecrate this land that does not belong to the army is disrespectful to the 'āina (love of the land) those who inhabit the land share, the state of Hawai'i that they borrow from, and the natives whom the state has stolen this land from in the first place. How can you say you are protecting the freedom and rights of the people of this country when your actions only endanger the safety and home of these people?</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Sarah Rice		<p>I urge the U.S. Army to respect native voices on this issue.</p>	<p>Thank you for your comment. The Army understands its responsibilities for proper stewardship of the land and has the utmost respect for Native Hawaiians. Please see Section 3.4 (Cultural Resources) of the EIS and Appendix I for the CIA.</p>
Christie Ritter		<p>Please listen to the Hawaiian native people who want this sacred land to be returned to them.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Christopher Roehrig		<p>No more Pohakuloa. 60 years of blowing up Hawaii is enough. We are an island. Go blow up the mainland which is thousands of times larger.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Peter Rucci		<p>I fully support extending the lease to the US Army at Pohakuloa, and for that matter , Makua Valley. Training areas, especially live fire areas , are critical for soldiers to gain and maintain proficiency with their weapons. As we now see in Ukraine, the weapon skills of our soldiers are still invaluable and certainly not outdated. In fact, they may be tested in Ukraine sooner than we think, and we mustn't be blamed for not giving them the best training available. We have too much military in Hawaii to disallow them from their warfighting training. I have driven on Saddle Road -- it is a moonscape -- it can't possibly be of any value to anyone except the military. Let it be so. The state closed down Kahoolawe only because of protests. Now it sits vacant with no other purpose. With no water wells, it will always be essentially a rock sticking out of the ocean. Now there is no site for all of the ships and aircraft stationed in Hawaii, or transiting through, to gain valuable and realistic target practice. Closing Kahoolawe was really a terrible decision. Please don't make another bad decision.</p> <p>Closing Makua valley to the Army would similarly be a poor decision. It is such a pristine area of the island right now -- beautiful. Within days of kicking out the Army, it will be filled with homeless encampments, trash, and filth. Anyone traveling up through the west side of Oahu will observe the complete lack of pride native Hawaiians have for their land. Despite their insistence on protecting their "aina" they simply don't. Nanakuli, Waianae, and Makaha are unfortunately just embarrassing and disgusting eyesores. Please don't let Makua valley become one, too.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Laura Safranski		<p>I am writing in support of option #4 and allowing the lease to expire naturally. I realize the land cannot be returned back return it to the state it was prior, I still support #4...You've heard a variety of reasons to end the lease, including cultural, environmental, spiritual, the dire need for residence statewide, etc...</p> <p>I don't take making public testimony lightly. It's a vulnerable place to be with a responsibility to educate oneself. I copied a statement I copied from your website. The last sentence clearly says that your presence vanishing will cause adverse impacts? Yet the first sentence says continued use results in significant adverse impacts. I again chose the 4th option, please end the lease. I realize you may feel the need to prepare for war takes precedent 24/7, as evidenced through your daily life as Military Personnel, but I still beg you to reconsider..."...continued public access restrictions on land used for traditional and customary practices will result in significant but mitigable adverse impacts to cultural resources. These significant impacts can be mitigated through appropriate consultation with Native Hawaiians and/or other interested groups. Impacts can also be mitigated through provision of public access to promote and protect cultural beliefs, practices, and resources. Impacts to other resources are less than significant for all action alternatives. The No-Action Alternative would have significant adverse impacts on biological resources, socioeconomics, and utilities."</p>	<p>Thank you for your comment. The Army understands its responsibilities for proper stewardship of the land and has the utmost respect for Native Hawaiians. Please see Section 3.4 (Cultural Resources) of the EIS and Appendix I for the CIA. In accordance with the lease, and under the provisions of existing law, the Army retains responsibility for cleanup and restoration of former training areas. After the lease expires, the Army will follow Army regulations to determine how and when the cleanup and restoration will occur, following the CERCLA process.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Dave Sansone		<p>Aloha Kakou. My name is Dave, D-A-V-E, Sansone, S-A-N-S-O-N-E. And, yeah, I just want to say thank you for hosting this. It's been awhile since we've had any public comment hearings. One thing I have noticed over the years is it's a public comment thing where we basically we come here, we talk, we go home, and usually nothing changes. I'm guessing about 5 percent of the time I have gone to a public comment hearing something good happens. With the military, never. So, yes, I mean, let's just back up to the beginning. So no substantive -- unsubstantive comments will be considered. I think the illegal occupation of these islands, this Kingdom nature here, this independent state is a very important piece of evidence that you need to consider. Because if you go along with the status quo and do the rubber stamp, including the people at DLNR, who are basically part of the facade of the fake state that we have here, you are all potentially taking on war crimes. Who would we be leasing this 23,000 acres out to for another dollar for what, 65 more years or so?</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Dave Sansone		<p>What kind of legacy have they had? Well, let's see. Kaho'olawe, an entire sacred island bombed but with unexploded ordnances. Red Hill, pollution everywhere. The world's largest polluter, U.S. military. Largest climate criminal, U.S. Military. Largest humans rights abuser, U.S. military, and its puppet governments that we have right now. And also, we're threatened by nuclear weapons. You know, we had that false missile alert. People were hiding their kids in sewers because they were afraid for their lives. The U.S. military's presence here puts this independent neutral country at risk. This is not to disrespect anybody in the military. I have relatives in the military. This is about standing up for what's right and being brave and having courage and doing what's right. So I say no, let's not train more people to go and repress other people's rights. We have almost 50 million people and family in Afghanistan and Yemen alone. Think about the countless others. A hundred thousand kids dead in Iraq because they bombed their water systems. So I understand why people join the military, for economic reasons and family reasons. But you need to wake up, open your mind, open your eyes, and get your shit together, because we've got to take a stand. And we need more people. We only have a few people here, the same old as every time. So thank you for your time.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Doris Segal Matsunaga		<p>We are writing to express our concerns regarding the continued use of Pohakuloa for live fire ammunition training and other military exercises. We are aware that only 23,000 of the 132,000 acres are State land leased to the US Army; and that it is only that smaller portion that is the subject of the current draft EIS. It is our understanding that this land came into the possession or use by US military during WWII. Given that the emergency conditions of WWII no longer exist, we would like to see the full acreage cleaned of unexploded ordinance and any other military created debris and returned to the State of Hawaii for access and use by her residents. However, if occupation and use of the State-leased land by the US Army must continue beyond the current lease period under any of the scenarios outlined, the US Army must (1) compensate the State at a much higher level than currently for that privilege, and (2) prepare for a future return of this land to the state by becoming better stewards of said land. While Pohakuloa Training Area may look like a wasteland good for nothing but target practice to the untrained eye, it is a precious resource to us, the residents of Hawai'i Island and the State of Hawai'i. Since we understand that live fire ammunition exercises are ongoing, we urge the US Army to immediately begin a program of clean-up-as-they-go; that is, following each live fire exercise, an ordinance clean-up team practices their skills by going in and cleaning up the site, such that it becomes safe for civilian use. This clean-up-as-they-go program should also be built into any lease renewal that may occur. We are grateful for the good work that soldiers and service members have done fighting Hawaii Island wildfires and assisting at Covid -19 testing sites. At the same time, we are disturbed by the legacy of a wartime military occupation. In the Waimea community, 31,000 acres leased to the US military during WWII are still to this day being surveyed for and cleared of unexploded ordinance, so that land can be safely used by residents.</p>	<p>As noted in Section 3.5.4.11, soldiers are required to collect casings from spent rounds, wood boxes, and other solid waste debris generated during live-fire training and return them to the ammunition holding area and ammunition supply point for recycling or disposal, as appropriate.</p> <p>Sections 3.5 and 3.15 supplemented with relevant information from Pohakuloa Training Area Range Operations Standard Operating Procedures (2022) regarding cleaning ranges after training.</p> <p>In accordance with the lease and under the provisions of existing law, the Army retains responsibility for cleanup and restoration of former training areas. After the lease expires, if deemed necessary, the Army would follow Army regulations to determine how and when the cleanup and restoration of State-owned land not retained would occur, following the CERCLA process.</p> <p>Through the Army Compatible Use Buffer/Readiness and Environmental Protection Inegration program, the Army works with various eligible entities (State conservation departments, universities, watershed protection organizations, land trusts, and other non-profit conservation-minded organizations) to enact a holistic encroachment management strategy that aims to prevent additional incompatible development, conserve native forests/habitat for threatened and endangered species, and bolster climate resilience adaptation and responsiveness.</p>
Gregg Shankle		<p>To: PTA Review Board Aloha. Our names are Gregg &amp; Ronelle Shankle and we reside in Waikoloa Village, Big Island Hawaii. In our opinion PTA and all the personnel attending training there are good neighbors and should be allowed to continue operations. During the last rangeland fire PTA and or Army personnel and equipment provided great aid toward containment of the fire which demonstrates that PTA is a good neighbor. Other than occasionally being behind a slow moving uphill convoy we have no negative comments regarding PTA. We fully support PTA, our young military men and the training mission there. We enjoy seeing and hearing the various occasional aircraft that participate in PTA activities. Please count us as in full support of continuing PTA operations.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Geoff Shaw		<p>My name is Geoff Shaw, G-E-O-F-F, S-H-A-W. First of all, you know, we are in the Pacific ocean. And I don't know if you guys understand what the word Pacific means, but I think you are pretty contrary to what that word means. I think that that's important, it's important to remember. As far as this EIS goes, this Draft EIS, I think you could just throw it away and start over again, because it just doesn't really cover what needs to be covered. It just covers whatever is convenient to you to make your case, but it doesn't cover what all these other people are talking about, and that's -- and all that is important to understand. And until you do that -- I mean, to kind of create an example.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Geoff Shaw		<p>When it comes to the water issues, I mean, the fact that they are trucking all this water up here, you know, like my understanding is that the military right now is supposed to be into all this green stuff, you know. But they don't even talk about the fact that all these trucks are transporting this water, the fuel that has to be used to do that, or any of that, you know. If you guys weren't up there, it wouldn't have to happen, you know. I mean, I agree with the other people that even though you found water, and we wonder why you aren't using the water underneath Pohakuloa, don't drill any wells. But you are lying to us, and that's very obvious, because I know that if you weren't contaminating that water you would be using it. So that's just so obvious that you can't even ignore it. And I don't care what excuse you make up or whatever. I mean, if you had the water there you would be using it, if it wasn't contaminated. And so, you know. Okay. Well, that's bout it. Thank you.</p>	<p>Section 3.15 of the EIS discloses the Army purchases potable water from a County Department of Water Supply facility in Waimea and trucks it to above-ground storage tanks on State-owned land at PTA for potable water use.</p> <p>As explained in Section 3.9 of the EIS, the shallow bore holes drilled on State-owned land did not reach groundwater. Groundwater extraction from State-owned land at PTA is not proposed or foreseen as part of the Proposed Action.</p>
Geoff Shaw		<p>Does it go into what having these military facilities here in Hawai'i, the danger that it creates in a nuclear world, does it go into that? I didn't see that. I haven't read the whole thing, so maybe it does go into that. But that's a -- you know, that's a very important consideration, because I don't think that Hawai'i would be a target if there wasn't all this military stuff going on. But, unfortunately, it is, and we have to consider that. Also, another thing, to get specific, that I think should be pointed out. The lands aren't owned, they were seized. We've been in meetings where the military seems to kind of be proud that they seized those lands and that they are seized lands. They say it over and over again. And since that's the reality that they are given, they should own it. You know, they are seized lands. They are not owned. If I go take somebody's car, I don't own it. I seized it, and that's what you guys did. I think that that executive order that seized the land is probably -- probably wouldn't hold up in court, especially considering the thing back in '92. But anyhow, you know, I think that that's an important thing to consider is that when you are talking about the lands that were seized, called them seized lands, I mean, it's just how it is, you know. You don't own it. You don't own any of this here. I mean, the state land, the state doesn't own the land. The state really isn't a legitimate entity. I mean, unfortunately, that makes Hawai'i a very dysfunctional place, and it would be better if they actually dealt with all that. But, you know, it's our reality, and that's what we have.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Geoff Shaw		<p>Geoff Shaw. And this is a point kind of going back to what Jim was talking about. When I was looking at two different maps, one map had like a quarry from precontact days that was a -- and then the statement about that quarry is that there were hundreds of different historical and cultural features about this quarry. And on another map it showed that same spot as being the area that they did the Davey Crockett training. And if that is the case, that needs to be explored. That needs to be made evident in your EIS, I think, because it is actually on the state land. And I don't really agree with concentrating on just the state land. I think that the whole totality of the Pōhakuloa land should be included in everything, because, you know, I think that even you guys agree that it is a total thing, and not enough in this EIS is done to talk about the effects of the impact area. You know, it's all one big ball of wax, and, you know, we need know more about what's happening there in that impact area, how like the wildlife, you know. The one guy was talking about the wildlife, you know. The endangered species are probably actually navigating into that impact area because they don't want to be around humans. They know that humans are bad. I'm sorry, but the animals, you know, like when they go feral they want to get away from humans. And those endangered species, they don't want to be around humans, so they are going to go where humans don't go, and that's the impact area, and that's not being studied. I guess those are the two points I wanted to make.</p>	<p>Please see EIS Sections 3.3 and 3.4 for the existing conditions within the region of influence related to the Proposed Action for cultural and natural resources. The Army's management actions to minimize impacts to these resources, as required under various regulatory programs, have been added to the EIS.</p>
Geoff Shaw		<p>This so-called EIS is merely an attempt to justify continued use of leased state lands for training and in no way clarifies what the actual impacts are. The army should at least find an agency that cares one iota about the environment because this agency does not. If they cared about endangered species then there would be discussion of strategies to protect all the specific endangered species located in the entirety of PTA instead of the generalities presented in this travesty of an EIS. The cultural resources are not considered from the perspective of the affected culture and once again nothing specific, only generalities. This is not an instance that a correction here and there will fix this document, a complete do-over should be done with actual concern for the environment and cultural significance being the focus, not perpetuating the war machine that is destroying our eco-systems.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Noel Shaw		<p>Aloha,</p> <p>I'm asking that the US Army no longer pursue use of Pōhakuloa Training Grounds. The space has been used far too long to train for wars we Hawaiians do not support. Further, the cheap lease hold cost has unjustly enriched the US Military when they are the most funded arm of the US governing branches.</p> <p>The adverse impacts it has on our 'āina and the well-being of each of us who have ancestral ties to these spaces are tantamount.</p> <p>The lease is up and it's time for Pōhakuloa to rest and regenerate. It's also time for her to be used as space to feed and heal our communities.</p> <p>Mahalo, Noel</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Carl Sholin		<p>I'm a cultural resources professional with 13 years of professional experience in archaeology. Five of those years I practiced in Hawai'i.</p> <p>I support the "No Action" Alternative.</p> <p>According to the draft EIS, PTA is to "(provide) logistics, public works, airfield support, and environmental and cultural stewardship in support of the USARPAC training strategy, while maintaining an enduring partnership with the Hawai'i Island community" (1-9). It's my belief that the US Army has been delinquent in its responsibility for environmental and cultural stewardship and has not partnered with the local community. This is evident in the draft EIS since it finds that all alternatives would result in cumulative adverse impacts to natural and cultural resources.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Carl Sholin		<p>Additionally, the State land is zoned as a conservation district, and the military use of it is designated as nonconforming. While the EIS states that the HRS 13-5 provides a provision for "authorization of additional uses" it does not articulate what the limits of those additional uses are under state law. Therefore the document does not establish that there is a statutory right to use by the military, only that there is a vague loophole that they're exploiting against the spirit of the law. .</p>	<p>EIS Section 1.4.2 has been refined to describe the administrative processes to use of the State-owned land following additional discussion with OCCL.</p>
Carl Sholin		<p>With regard to cultural resources, the EIS states that under Chapter 6E, the determination of effect would follow the EIS process (1-17). However, this is a federal undertaking and, therefore Section 106 of the NHPA is applicable not Chapter 6E alone. Typically, Section 106 compliance would precede a finding of impact of an EIS. The EIS needs SHPD concurrence with an assessment of effect, before it can adequately address the cultural resources concerns presented in this document. Thank you for your time</p>	<p>EIS Section 3.4.2 documents that ongoing activities at PTA have been taken into account through the Section 106 consultation process, and are documented in a 2018 programmatic agreement to resolve adverse effects.</p>
Jeannette Soon-Ludes, PhD		<p>June 7, 2022 Submitted by: Jeannette Soon-Ludes, PhD   Honoka'a, Hāmākua District, County of Hawai'i Comments on the Draft Environmental Impact Statement for Army Training Land Retention at Pōhakuloa Training Area (PTA) Purpose and Need Statement Purpose and need statement does not address the obligation of the Army to conduct itself as a responsible tenant of lands held in the public trust by the State of Hawai'i. In addition, alternatives considered do not fully explore sites outside of the Hawaiian archipelago. Specifically, the draft EIS does not explore actions that involve the relocation of training or training features under the rationale that such actions would require separate NEPA compliance. However, failure to explore relocation alternatives does not help the Board of Land and Natural Resources weigh the impacts on the natural, cultural, and human environment against the stated but unconfirmed needs of U.S. security and defense strategies. Request for 1) Expanded Purpose and Needs Statement to address present obligations and future out-of-state alternatives;</p>	<p>The Army's cleanup efforts after training exercises are discussed in Section 3.5.4.11. Text clarified to note that the Army removes or deactivates all live and blank ammunition upon completion of a training exercise in compliance with the lease and removes solid waste prior to departing a training area or range facility in accordance with the U.S. Army Garrison PTA External Operating Procedures.</p> <p>Locations outside of the State-owned land at PTA do not address the Proposed Action (retention of the State-owned land), do not meet the screening criteria, and were previously considered (see Section 1.1.3).</p>
Jeannette Soon-Ludes, PhD		<p>Socioeconomics The draft EIS states several facts about Army economic expenditures in relation to the Pōhakuloa TA and the impact of these expenditures on the County of Hawai'i. These facts include: ? Army expenditures support 1,962 employees in the County of Hawai'i, including military personnel, civilians, and contractors (p. 3-142) ? Army expenditures accounted for approximately \$92M of labor income in the County of Hawai'i, including military personnel, civilians, and contractors (p. 3-142) ? Army expenditures in the County include local purchases of potable water, equipment, and other services, such as solid waste disposal, porta johns, and custodial services (p. 3-142) ? Regional airports are used to transport troops and various groups, including DoD, state, and local agencies contribute to the local economy by traveling to PTA for training (p. 3- 142).</p>	<p>Section 3.10.4 notes that in 2019 Army-specific impacts on the County of Hawai'i include 1,962 employees (i.e., military personnel and civilians, to include contractors) and \$92M in labor income (i.e., military personnel and civilians, to include contractors). Additionally, in 2019, an estimated 88,098 individuals in the County of Hawai'i were employed, meaning approximately 2% of the employed individuals were Army employees (i.e., military personnel and civilians, to include contractors). This information was obtained from the PTA Real Property Master Plan Socio-Economic Impact Assessment.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Jeannette Soon-Ludes, PhD		<p>The persuasive purpose of these facts is to frame the socioeconomic impact of DoD presence at Pōhakuloa in net positive terms. However, these facts aggregate disparate categories and ignore significant details that would more fully represent the degree and quality of economic impact. Of the 1,962 employees supported by Army expenditures in the County of Hawai'i, for example, the type of employee is not disaggregated between military personnel, civil service, and contractors. This is significant for several reasons. 1. Military personnel do not necessarily pay income taxes in the state in which they are stationed. As such there is no way to ascertain how much of the stated \$92M in labor income generated in the County benefits the State. 2. There is no disaggregation and description of the type of civil service employment connected with Army expenditures in the County. As a result, there is no way to determine which jobs would disappear without Army presence (i.e. essential to army activities) and which jobs are community-focused and potentially remain without Army presence at PTA. 3. There is no detail regarding the number, economic value, and location of central offices for contracts awarded for Army activities within the County. Consequently, there is no way to ascertain the extent to which the economic value of those contracts results in real benefit to the County. The facts also frame local expenditures and travel to PTA as positive economic impacts of the Army presence in the County of Hawai'i, generally, and Pōhakuloa specifically. However, for both labor and additional expenditures, there is no cost-benefit analysis that takes into consideration that military spending has been found to have an adverse impact on long-term economic growth.</p>	<p>Thank you for your sharing your concerns. Your comment has been noted.</p>
Jeannette Soon-Ludes, PhD		<p>(Footnote 1: 1 Does Military Spending Matter for Long-run Growth? Giorgio d'Agostino, J. Paul Dunne &amp; Luca Pieroni. Pages 429-436   Received 26 Apr 2017, Accepted 26 Apr 2017, Published online: 05 May 2017 at <a href="https://www.tandfonline.com/doi/abs/10.1080/10242694.2017.1324723">https://www.tandfonline.com/doi/abs/10.1080/10242694.2017.1324723</a>).</p> <p>These comments are submitted for consideration in preparation of the final Environmental Impact Statement, with a request for 1) Expanded Purpose and Needs Statement to address present obligations and future out-of-state alternatives ; 2) A cost-benefit analysis that includes disaggregated data and factors in the demonstrated negative impact that military spending has on economic growth; and 3) An assessment that integrates Kanaka Maoli perspectives on socioeconomic wellbeing. Thank you for this consideration.</p>	<p>The Army's cleanup efforts after training exercises are discussed in Section 3.5.4.11. Section 3.5.4.11 clarified to note that the Army removes or deactivates all live and blank ammunition upon completion of a training exercise in compliance with the lease and removes solid waste prior to departing a training area or range facility in accordance with the U.S. Army Garrison PTA External Operating Procedures.</p> <p>Locations outside of the State-owned land at PTA do not address the Proposed Action (retention of the State-owned land), do not meet the screening criteria, and were previously considered (see Section 1.1.3).</p>
Kaponou Souza		<p>I strongly oppose renewing the Pohakuloa lease. Both the state of Hawaii and US military have done a poor job at managing Hawaiian lands and at a dollar a year it is a gross abuse of stewardship of Hawaii Trust Lands. This arrangement provides zero return on investment other than making Hawaii citizens less secure by having a large military presence in Hawaii, a contaminated ecosystem, and cost prohibitive cleanup. Hawaii does not need to be this Weaponized and does not serve to benefit Hawaii's people. Do not renew the Pohakuloa Range Lease.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Matthew Souza		<p>Cultural artifacts that reflect Kanaka Maoli or Hawaiian history are largely being ignored by the United States government who while illegally occupying the islands of Hawaii and have in fact no treaty of annexation or legal plebiscite under which native Hawaiians give their consent to be governed by an occupying force. Any attempt to use United States law or processes to force such administrative rules or legally binding jurisdictional regulations are in fact a war crime without any treaty or consent by the occupied country and the subjects being governed.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Mele Spencer		<p>I am a member of the Japanese Chamber and Hawaii Chambers. I support the Pohakuloa Training Center.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Lance Stevens		<p>My name is Lance Stevens, L-A-N-C-E, S-T-E-V-E-N-S. I'm born and raised in Waimea, and I come in support of the renewal of the leased lands. And that's because I have got, you know, 27 years I work up there. I work with an awesome bunch of people. And I know we got the environmental impact statement and all the information. I see it. I see these guys work hard. We work with a great team, the environmental group, DPW, Police, Fire, and everyone else that's up there to ensure that our troops train safely, that everything is done the correct way, in accordance with our mandate from Congress, and that they follow the rules. And, you know, I got to enforce that. As a police officer up there, I'm making sure they do what they are supposed to do. And then, of course, you know, our commanders, as great as they are, they come in two years, maybe three years, if they are lucky. But us guys that get to work up there and work with the soldiers, work with the Marines, the Navy, and the Air Force, and HPD and other law enforcement, the FBI, it's awesome training for us. And that's to make sure that we can provide a safe environment. We serve and protect, and we ensure that -- you know, I was raised by a dad that served in the Army. He was in the paratrooper unit, fought in the Korea war. He always instilled in us whatever job you do you do the best that you can. And that's -- I'm so grateful. I have been blessed. You know, God has blessed me. 27 years up there. My tour of duty coming to the end. You know, you get older, things happen. So I'm off the road. I'm in the admin position, but I'm going to try and do everything I can to help facilitate a good working environment, as well as the other people that I work with up there. And we want to make sure that everybody has the information they need and they do those things they do. And again, you know, I'm just grateful for that opportunity. And I felt strongly. I work here. That's my boss over there. But got nothing to do with that.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Lance Stevens		<p>I just felt strongly about my mom and dad raised us to be patriotic citizens, do what we got to do. I got the opportunity to serve in the Air Force, and I might have made a career out of it, except my height and weight didn't match their standards. I have to be 179, and my whole service I think I was 200, 205 pounds. So I got my honorable discharge, and because of that, you know, I worked the ranch many years. It's tough work. The pig. It's good, but it ain't that great. I had my family to take care of, and I think -- that's personal, yeah. But my reason for bringing that up is I was able to serve - I feel proud. I got to serve the country. I got to meet these men and women that wear their uniform and protect us, holding their oath to protect these United States and our Constitution, to keep it in place, to prevent these other people, socialists, communists from invading. You see what's going on in Ukraine. China is threatening Taiwan. Is that it? Three minutes. Well, thank you for the opportunity and mahalo.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Megan Stokes		<p>It is time for this land to be returned to the Native population of Hawaii. The army's use of the land has disturbed the environment in the past. This was necessary for a time when there was a Pacific war front, but is no longer more important than protecting the land.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Kaleiheana Stormcrow		<p>I do not support the lease retention at Pōhakuloa Training Area. I am a field biologist, and when I am doing field work in the area I can hear and feel the bombs going off. There is no possible way that they can be annihilating land like that and not harming the endangered plants and birds that live there, and in the nearby areas. PTA has run its course. End the lease, remove all the unexplored ordinance and give the land back to Hawaiians.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Nathan Strain		I grew up in Hawaii. Everything from the military has been constant lies and environmental destruction. The military lied about returning Kaho'olawe in a habitable state, and everybody knows about the decades of lies and shoddy practice that led to the Red Hill disaster. At this rate I honestly wonder why the US Military is allowed to operate in the State Of Hawaii at all. I do not trust the statements about the impacts of training at Pohakuloa, nobody should, not after the years of statements and "studies" about Red Hill. The land should be returned to the state.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Claire Sweeney		The military has enough land. Leave these islands to the people.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Manu T		while there is a million places for the military to train, there is only a finite amount of the 'āina left, please do your parts to protect it and move your training ground elsewhere	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Jane Taylor		I am not in favor of any form of military occupation continuing on the Big Island. It seems wrong to choose such an absolutely fragile and unique ecosystem for such degrading activity. There must be less unique places that can serve the military. All military use should be discontinued. My suggestion is that the military be required to clean up its mess (oversight required as they have not proved all that trustworthy) and return all of the big island training areas to pristine status. I further suggest that those areas become part of the National Park system with a mandate to protect both unique biological and geological aspects as well as cultural. Neither the county nor the state of Hawaii seem equipped to care for this land - hence that latter suggestion.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Megan Taylor		I hike in this area and passing by guns being fired is unnerving and feels extremely unsafe. It would be preferable to decline renewal and move such activities off this island. It is a sacred place unsuitable for such activities.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Sally Taylor		It is time for a complete review of military land use in the Hawaiian Islands. The Pohakuloa Training lands should be returned to the State of Hawai'i.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Sherri Thal		The situation at Pohakuloa is dire. The military has been occupying 23,000 acres of Hawaiian land illegally for nearly sixty five years for just one dollar. Every part of that statement is a travesty!! The EIS fails to address the illegal occupation as well as explain the unexploded ordinance littering this sacred Hawaiian site. The EIS fails to address the fact that NOTHING that the Military has fired off has EVER been cleaned up! The EIS does not give a solution to guaranteeing oversight by the Hawaiians to preserve the 'aina and artifacts. The EIS fails to address the simple fact the military presence in Hawaii is completely misaligned with the practice of Aloha and Aloha 'Aina. I choose the EIS option number 4, the No Action Alternative. Please, give the 'aina back to the Hawaiian people.	Thank you for your comment. In accordance with the lease, and under the provisions of existing law, the Army retains responsibility for cleanup and restoration of former training areas. After the lease expires, the Army will follow Army regulations to determine how and when the cleanup and restoration will occur, following the CERCLA process.

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Megan Thayne		<p>The DEIS also states that "the availability of freshwater, potential for coastal flooding, stability of ecosystems and biodiversity, and the health of Indigenous populations could be adversely impacted from ongoing climate change." Additionally, the DEIS states that "coastal flooding is not a threat to PTA given that the installation is several thousand feet above sea level." What is not addressed in the DEIS, however, is how these two climate change impacts can be reconciled. While effects of climate change do not impact the viability of the Proposed Action, they will affect the future habitability of land now occupied by Indigenous populations. This suggests that displacement is likely in coastal regions and that land well above sea level will be needed to house displaced populations. It does not seem like the DEIS considers the dynamics of climate change in the designation of alternatives. For example, how might the displacement of coastal residents impact future land use of the military? Will the land in the Proposed Action be needed to relocate displaced Indigenous communities? Can you explain why climate change analysis was not implemented when identifying the purpose of, and need for, a proposed action and defining alternative actions that could meet that purpose and need? ?</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Megan Thayne		<p>SCOPING PHASE Public comment periods are an important aspect of the NEPA process. The purpose of the scoping process is to engage the public in deciding what issues are within the scope of the analysis and can serve as a way to anticipate impacts, select alternatives, and develop mitigations. The preparation of the DEIS should be informed by comments received from cooperating agencies during this process. During the scoping phase, the EPA submitted a comment encouraging that "different land retention methods" and "varying time periods for land retention" be incorporated into the "range of alternatives to compare impacts of the different methods. "</p>	<p>There are no cooperating agencies for the EIS.</p> <p>Section 2.3 revised to note that license is not analyzed as a land retention estate because it is for minimal permission to occupy real property for a short duration. It would not allow for predictable long-term use by the Army; would not enable future facility and infrastructure modernization; and would not necessarily allow exclusion of other users from some facilities, utilities, and infrastructure. Consequently, it does not meet the following elements of the purpose and need statements: (1) provide a long-term interest, (2) allow for future facility and infrastructure modernization, and (3) provide austere, real-world training environment.</p> <p>Section 2.3 revised to clarify there would be no difference in ongoing activities on the State-owned land retained under the land retention estates selected for analysis (i.e., fee simple title, lease, easement). The only difference is that under lease and easement the Army would adhere to lease/easement conditions, assumed Army obligations in the Court Ordered Management Plan, and applicable State processes/administrative requirements. Because ongoing activities, lease/easement conditions, assumed Army obligations in the Court Ordered Management Plan, and applicable State processes/administrative requirements would be the same under lease and easement, the impacts for lease and easement would be the same; therefore, the EIS only analyzes fee simple title and lease. EIS revised to provide potential impact for retention via fee simple title and lease where impacts are expected to differ.</p> <p>The Proposed Action does not include land retention duration because that would be negotiated with the State following completion of the EIS. Section 2.2.5 includes Alternative 6 as a short-term retention alternative and the reasons it was dismissed from detailed analysis.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Megan Thayne		<p>The alternatives listed in the DEIS only range in retention size and fail to provide alternatives that analyze the impacts of different retention methods and varying temporal scales. Why did you choose not to reflect the input from the EPA in your alternatives selection since the purpose and need statement does not preclude these types of alternatives? Also, the DEIS mentions plans to consult Native Hawaiians for mitigation efforts but there is no representation from this group in the creation of the DEIS. Can you explain why you chose not to consult with Native Hawaiians in conjunction with or prior to the drafting of the purpose and need for the Proposed Action?</p> <p>CONCLUSION The NEPA process promotes informed decision making and sharing information with the public [REF 1]. Considering the risks of climate change--especially for Indigenous populations--and the highly controversial presence of the military in Hawai'i, it seems prudent to conduct a more holistic, specific, and actionable climate change analysis [REF 2] as well as incorporate substantive concerns from the public and cooperating agencies into the consideration of the Proposed Action and Alternatives. This DEIS does not contain a sufficient climate change analysis and the scoping phase failed to meaningfully engage the public and cooperating agencies in the selection of alternatives and mitigations for the DEIS. I appreciate the opportunity to provide comments on the DEIS and I hope my input has been beneficial. REFERENCES CITED: [REF 1] Foley Hein, J., &amp; Jacewicz, N. (2021). Implementing NEPA in the Age of Climate Change. Michigan Journal of Environmental &amp; Administrative Law, (10.1), 1. [REF 2] Webb, R. M., Panfil, M., Jones, S. H., &amp; Adler, D. (2022). Evaluating Climate Risk in NEPA Reviews: Current Practices and Recommendations for Reform.</p>	<p>Section 2.3 revised to note that license is not analyzed as a land retention estate because it is for minimal permission to occupy real property for a short duration. It would not allow for predictable long-term use by the Army; would not enable future facility and infrastructure modernization; and would not necessarily allow exclusion of other users from some facilities, utilities, and infrastructure. Consequently, it does not meet the following elements of the purpose and need statements: (1) provide a long-term interest, (2) allow for future facility and infrastructure modernization, and (3) provide austere, real-world training environment.</p> <p>Section 2.3 revised to clarify there would be no difference in ongoing activities on the State-owned land retained under the land retention estates selected for analysis (i.e., fee simple title, lease, easement). The only difference is that under lease and easement the Army would adhere to lease/easement conditions, assumed Army obligations in the Court Ordered Management Plan, and applicable State processes/administrative requirements. Because ongoing activities, lease/easement conditions, assumed Army obligations in the Court Ordered Management Plan, and applicable State processes/administrative requirements would be the same under lease and easement, the impacts for lease and easement would be the same; therefore, the EIS only analyzes fee simple title and lease.</p> <p>The Proposed Action does not include land retention duration because that would be negotiated with the State following completion of the EIS. Section 2.2.5 includes Alternative 6 as a short-term retention alternative and the reasons it was dismissed from detailed analysis.</p>
David Thielk		<p>Aloha, It is my belief that the army should not be allowed to renew their lease of those lands. Those are our native lands, and the army cannot be trusted to treat those lands with the proper care and respect the people of Hawaii expect of them. The military has been known for their poor management of the Hawaiian lands which they oversee, as just a few months ago the military proved its inability to prevent very serious and dangerous grievances from occurring at Red Hill. Their management of the Red Hill situation was abysmal, and they are ignorant for allowing it to continue for so long. But even with the contaminated water at Red Hill seemingly under control, can we trust the military to keep it that way? Looming in very recent memory are the brutal and cruel deformations of our islands Kaho'olawe and Molokini at the hands of the navy. The navy dragged their feet in the cleanup of our sacred island, doing a lazy, sloppy, and incomplete job, the consequences of which are still felt today. The military could not be trusted to clean up their mess at Kaho'olawe, so why should we trust them to properly contain future water contaminations at Red Hill? Should anything similar happen in any of their other Hawaiian facilities, how can we trust them to resolve it properly? Let us not forget our small island Ka'ula and the many thousands of native birds slaughtered in the name of gunnery training. In what way is that necessary for the training of their soldiers? The argument that our lands are needed for the increased survival of their soldiers is unfounded and foolish. They may easily receive equal, if not superior training at facilities elsewhere, without the need for the devastation of our wildlife.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
David Thielk		<p>In short, this is not just about the army, but the armed forces as a whole. They have proven untrustworthy in their management and jurisdiction over Hawaiian lands and are wholly and utterly incapable of showing the respect our lands deserve. It is for these reasons that I believe the army should not be allowed to hold their lease of these 23,000 acres of Hawaiian lands, and they should be returned forthwith.</p> <p>Mahalo, David Lihau Kai Thielk</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Steven Thomas		<p>Aloha Mai Kakou,            'O wau 'o Steven Thomas,            Aloha Everyone, My name is Steven Thomas.            I am descended from the line of King Liloa and the progenitors of the House of Keawe. I have lived in Central O'ahu my entire life and I have experienced the colonization of mind and culture. My kupuna have been made to accept the criminal act of the stealing of our country by your country in violation of treaties and of international law" as stated in the Apology Bill of 1993 (Public Law 103-150). Subsequently, we have been made to accept the so-called "necessity" of leasing thousands of acres of our land for military training purposes. I say enough already. Go blow up your own country. Stop killing and desecrating mine. I have been in Makua Valley as well as around Pōhakuloa. The mana of our ancestors is still there and still very strong but the 'āina is crying out. Crying out for me to do something.... say SOMETHING! But I fear this is merely a formality and the military/government machine will do whatever they want anyway. I've heard the word "compromise" come up with regard to similar land lease issues in the past here in Hawaii, but I've learned that it usually results in some kind of a token offer in return for continuing on with the originally planned use... most times, our people are outnumbered by those who have absolutely no knowledge of what they're doing to the land. So again, I would urge you to take your military training back to your country. My people still have a chance to resuscitate this 'āina, and we are the only ones who inherently know how to do this. It's in our bones. But.... America            "He ali'i ka 'āina, he kauwā he kanaka" - The land is chief, the people are the servants            Mahalo</p>	<p>Thank you for your comment. The Army understands its responsibilities for proper stewardship of the land and has the utmost respect for Native Hawaiians. Please see Section 3.4 (Cultural Resources) of the EIS and Appendix I for the CIA.</p>
Kupaianaha Thurman		<p>With the use of the United States military in which the United States federal government oversees them. The military base know as Pōhakuloa Training Area (PTA) has been desecrating Hawaiian lands for over 67 years since it was first built in 1955. Positioned between two sacred mountains of Mauna Kea and Mauna Loa sits 108,863 acres of stolen land in which US military forces occupy. Leased out at the cost of \$1 per year, this is a disgrace when Native Hawaiians can't even afford to live on their own land. This area is being used for target practice to bomb and shoot millions of dollars worth of tax paying money to desecrate this land. Simply put the common people do not want this base and it's military presence on our 'āina any more. You are not welcomed here. So do the right thing and close down PTA. Kū Kia'i Pōhakuloa! Kū Kia'i Mauna!</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Melissa Tomlinson		<p>I'm writing today to express my disapproval and disappointment in the very incomplete EIS draft. I did not read the whole thing because that would be a huge waste of my time, but I know without uncertainty it is incomplete because of its lack of attention to Kānaka Maoli, their culture, their spiritual practices and their land, among other reasons. It is incredibly frustrating and embarrassing knowing the history of how the U.S. military came to occupy and allow such genocide. It is past time for rectifying such violent, abhorrent behavior. It is past time for reconciliation, yet it must be done. Please leave Pōhakuloa. Please don't even attempt to renew the lease and just go. Free Hawai'i from underserving militant war and violence. The world needs this because the world needs Hawai'i and when I say this I am saying the world needs Kānaka Maoli to be free of their oppressors. All I can say as an American citizen is I agree with and support Kānaka Maoli and so many others in calling for the Army to deoccupy and demilitarize Hawai'i and go home. You do not belong there and without any doubt it would behoove everyone there to heed the words of Auntie Maxine and the many others who have been speaking out for years.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Cherie Townsend		Hawaii is the extinction capital of the world, if you will not leave the Mauna in peace at least be stewards of the land that you occupy. Makua is a valley that you occupy but under your stewardship it is more pristine than most and the Army is responsible for that. Please do your part for Pohakuloa as well protect both from development and the onslaught of money driven greed.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Hannah Ulm		I do not agree with the impact these operations will have on Hawaiian land. The US needs to respect the cultural sites of Hawaiian tradition, similarly to NAGPRA in the contiguous states. Whether or not these are sacred sites should not alter your conscience in this matter. Hawaii is not intended for military use. US needs to recognize its place in the world and halt its imperial influence in areas where the native peoples have no interest in participating. NOT YOUR LAND. Not your choice.	The Army's compliance with NAGPRA is described in Section 3.4 of the EIS.
Kaila Undisclosed		Aloha. My name is Kaila. I just wanted to submit a comment and share that the desecration of indigenous land is not only wrong but has severe environmental impacts that will last for thousands of generations. And so I hope that you can find it in your heart to restore the aina to its true splendor and you help heal. I hope it ends well. Love you. I am going to try Hawaii. ****ing military Hawaii.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Marie Valencia		There's a necessity to preserve and return Hawaiian land to the Hawaiian people now more than ever and the US Army should respect those wishes by not building on any Hawaiian land anymore and further consider returning any land taken.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Johnny Angel Victorino		<p>Aloha Mai kākou</p> <p>I am writing testimony against the renewal of the US military's Pohakuloa lease. I am also speaking behalf of my Ohana, both friends and family. The desecration of pristine native land and species have been not been held accountable for too long. Too long have the mortars and RPG training practices shake our island.</p> <p>Too long have the Palila bird and the Nai'o tree suffered from explosives and bullets. Nearly 200000 acres lended to the US military for them to make irreparable damage to both earth and water. There is no action or attempt of action that could mend the massive holes they leave on our mountain. What about Hawaiian perspective? What about Aloha 'āina? What about taking care of our resources that lie within this Little Rock we call home?</p>	Thank you for sharing your concerns. The Army understands its responsibilities for proper stewardship of the land and has the utmost respect for the Hawaiian native population. Please see the revised Sections 3.3 and 3.4 of the EIS and Appendix I for the CIA.
Johnny Angel Victorino		Does the military account for all the bullet casings or metal shrapnel spread across the PTA? Doesn't that effect our natural environment? The Military doesn't incorporate a Hawaiian Perspective into their usage of our land so why should they benefit from Hawaiian Land! As a local boy, born and raised on Moku O Keawe, I STRONGLY advise you no longer let US military to use Pohakuloa as a playing ground. There are hundreds of families of Hawaiian bloodline waiting for their piece of land. Just a piece, not a base, not a ranch, or a preservation, just a piece. So please listen to the people of this land. Victorino Ohana	<p>Section 3.5.4.11 of the EIS states that soldiers are required to collect casings from spent rounds, wood boxes, and other solid waste debris generated during live-fire training and return them to the ammunition holding area and ammunition supply point for recycling or disposal, as appropriate. Section 3.5.4.11 revised to state that military personnel training at PTA follow several requirements for range operations, maintenance, and clearing including the Pohakuloa Training Area Range Operations Standard Operating Procedures (2022) and the U.S. Army Garrison, Pohakuloa (USAG-PTA) External Standard Operating Procedures (2018).</p> <p>Sections 3.5 and 3.15 supplemented with relevant information from PTA Range Operations Standard Operating Procedures regarding cleaning ranges after training.</p> <p>In accordance with the lease and under the provisions of existing law, the Army retains responsibility for cleanup and restoration of former training areas. After the lease expires, if deemed necessary, the Army would follow Army regulations to determine how and when the cleanup and restoration of State-owned land not retained would occur, following the CERCLA process. Within the CERCLA process, all stakeholder input is taken into account, including the public and Native Hawaiian perspective.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Kaukaohu Wahilani		<p>Aloha. My name is Kaukaohu Wahilani. K-A-U-K-A-O-H-U, W-A-H-I-L-A-N-I, and I hail from Pao, Waianae Valley, on the Island of O'ahu, and I am here to use my testimony in opposition to the extension of the lease for Pohakuloa and the further desecration of the Piko of Makua Keawe. Like Uncle Kalani Flores has said at the ending of the meeting that we have (indiscernible) the army was just the actions that have been done, continues to be done to desecrate our aina. You know better. You tried war all these years. Let's do peace and love. So this is my testimony. Please take it under advisement. Kakou pui (ph.), mahalo nui, aloha.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Diane Ware		<p>The Environmental Impact Statement should thoroughly analyze the alternative of moving training from Pōhakuloa to a less sensitive area outside of Hawai'i, in case the military does not retain control of the 23,000 acres. Losing this acreage would severely restrict training, since the area hosts vital facilities for electricity, drinking water, communications, and roads. Why was all this sited here under a temporary lease (expiration in 2029)?</p> <p>Why does the military need Pōhakuloa, when it already has access to thousands of acres of land, and hundreds of square miles of ocean and airspace, around Hawai'i? Military training causes serious impacts at Pōhakuloa since it is a sensitive area with 50 at-risk species, and with tremendous cultural significance.</p> <p>Why should the public rely on claims that the military cannot manage without Pōhakuloa? The same claims were made for Kaho'olawe and Kapūkakī (Red Hill).</p> <p>Why should the military be entrusted with this land? A recent court decision (Ching case) foundation that the military failed to meet obligations under its current lease for the area. They failed to clean up unexploded ordnance, junk cars, an old tank, shell casings, white phosphorous, and rubbish. There have been three fires in the past seven years. Only about half of the needed archaeological surveys have been done. And they claim they have not found even one traditional cultural property at Pōhakuloa.</p> <p>The military has also been negligent elsewhere. At Waikoloa, unexploded ordnance has not been cleared for decades. On Kaho'olawe, one out of every four surface acres has not been cleared of unexploded ordnance. At Kapūkakī (Red Hill), the military claims the water is now safe, but people returning to their homes report continued problems.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Braeden Watanabe		<p>Though I believe that there is a cultural aspect to the land as recognized in Hawaiian tradition, I believe that the training and military activities that take place on Pohakuloa are deemed as essential and necessary, and outweigh the "damages" and detriments of these activities on Hawaiian culture. While cultural preservation and honoring tradition is important, I believe that it is essential for military personnel to have the resources needed to train, in the occurrence of any war or threat.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
J. Watanabe		<p>Comments: 1. The Army's draft EIS fails to identify any prior NEPA evaluation of the environmental impacts to the State owned/leased lands, except for a conclusory statement on p. 1 -15, Section 1.4.1, which provides that "[t]he Proposed Action is a real estate action (i.e., administrative action) that would enable continuation of ongoing activities on the retained State-owned land. Current activities within the State-owned land were previously analyzed in separate NEPA documents, as applicable; therefore, continuation of current activities is not re-evaluated in this EIS." I searched the Army's draft EIS document, including the appendix and references, and found no prior NEPA evaluation of the use of State owned/leased lands for the following activities on p. 2-2: PTA Battle Area Complex Digital live-fire range for mounted, dismounted, and aviation training; Ammunition Holding Area, where ammunition is temporarily stored while a military unit is training; Firing Point Location used for live-fire and non-live-fire training by indirect fire weapons (i.e., artillery, mortars, and rockets); 14 Multi-purpose live-fire range Landing Zone Cleared area for landing and takeoff of helicopters and tilt-rotor aircraft; and Drop Zone Cleared area used to drop equipment and personnel via parachute from aircraft.</p>	<p>A list of previous NEPA compliance documents for training at PTA has been added as Appendix E (see Section 2.1). State permits and approvals required under HEPA are described, where appropriate, in the affected environment (Chapter 3) for the applicable resource.</p>
J. Watanabe		<p>According to the Army's draft EIS, the "lease for Army use of State-owned land was signed in August 1964" (p. 1 -17). NEPA was enacted in January 1970. If prior NEPA analysis of the impacts of Army activities on the State owned/leased land was conducted, please identify the NEPA document and make it available for public review, so the public has the opportunity to review and comment. If there is no such prior NEPA analysis, then the Army has failed to comply with NEPA and must prepare another draft EIS to include the required environmental NEPA analysis of the impacts of Army activities on State owned/leased lands that Army failed to analyze. 2. Given the Army's failure to comply with NEPA at Makua Military Reservation, the Hawaii public has legitimate concerns about the Army's compliance with environmental laws, such as NEPA. The proponent of the Army's draft EIS for PTA, Daniel Misigoy, Colonel, U.S. Army Commanding, lacks integrity and has demonstrated a willingness to violate federal laws, including Army regulations to achieve his personal aims. This is based on personal experience. With such a person leading this draft EIS, it is hard to place any trust in the Army's compliance with federal environmental laws or Army's own regulations. For these reasons, I object to the Army's use of PTA. Very truly yours. J. Watanabe</p>	<p>The EIS has been revised to provide Appendix E, which includes NEPA and other environmental planning documents and existing management measures.</p>
Hoku Webb		<p>When your lease is up in 2029 you will have had the land for 65 years, perhaps it is time again for the Native Hawaiians and residents alike to access the land -- in 65 years from 2029 you can lease again. In terms of environment impact, I can only assume (because I probably do not have access to the land) that training for war is nearly as destructive to the land than war itself -- and it is happening over historical and cultural land.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Justine Weingartner		<p>I urge you to listen to native Hawaiians and remove all US military from land that does not belong to them nor hold cultural significance.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Kerry Wells		<p>So my name is Kerry Wells. That's K-E-R-R-Y, W-E-L-L-S. I'm a citizen of Waimea. I live on the Puu Nani subdivision, and I have two children, two boys, and they are little. They are eight and 11.</p> <p>When the training activities are happening, which I realize is not on the leasehold land, it's on the training range area, the bombs, we can hear them from the house, and it shakes the house, and my son cries, my 8 year old. And he doesn't really understand what's going on, so I have to explain, you know, that they are bombing. It's really concerning, and so I'm asking that a noise study be conducted. And I realize this EIS only covers that leasehold land, but I would really like a noise study conducted on the bombing activity that's happening. I don't think a noise study was conducted for this EIS, and I know that what's going to happen is that the noise study, if it's done in this area, will probably find that the noise contours are zero. So I am asking if there is some way, and I'm trying to think of a way, to get a noise study done. And I know that the noise contours would probably reach my house. It shakes my house when the training is being conducted, which is roughly, I believe, every three to six months and it's pretty much every day, day and night, and that's, you know, every like a two-week period during that time. And then during RIMPAC, that activity increases substantially. So it would be great if that noise study could be conducted during RIMPAC activities. So yeah, that's my main comment right now. I really do appreciate everybody coming. I was hoping there would be more people here. I work for NAVFAC Pacific, and I'm in the environmental division there. I do NEPA. So it's -- I wish there was more people, because that's part of the process of EIS is the public being involved. So right now this is my comment is just that noise study, and thank you for letting me speak. I really appreciate. Like I said, lots of powerful speeches being made tonight. So thank you.</p>	<p>The best available data for noise analysis was incorporated into this EIS. A noise modeling study was done in 2020 that considered noise zones for military munitions using a baseline model (EIS Figure 3-8), a neutral weather model (EIS Figure 3-9), and a model for weather conditions that enhance sound propagation (EIS Figure 3-10). This study is discussed in Section 3.7.4 and analyzed in Section 3.7.6.</p>
Tristyn Wiehl		<p>I'm here tonight. I wasn't really prepared to speak, but I feel called to do so. I really want to mahalo all the kupuna in the room who have come before me and shared their thoughts and opinions. I really appreciate you folks. Sorry I'm a little bit nervous. I just wanted to start by saying that at the beginning of this talk you folks mentioned that Hawai'i needs the Army and the Army needs Hawai'i, and I don't believe that that's true. I heard what you followed it up with, and it mostly sounded to me like the reasons why the military needs Hawai'i, not really the other way around. I don't see there being a reciprocal relationship in place. I wanted to mention that we can hold multiple realities in our minds at the same time. We can understand, as bruddah said earlier, why people join the military, for economic reasons. I know I'd be making a lot more now as a college graduate if I was in the military, but that's not what my heart has called me to do. I do appreciate the formality of this meeting. I mean, it's just that, though, it is a formality, and I think, as other people have said, we don't necessarily feel that things that we say are actually taken into consideration when decisions are made, especially when it comes to the military and aina.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Tristyn Wiehl		<p>I apologize. I didn't introduce myself fully. I'm from O'ahu, Mililani specifically. I also agree that, you know, if I wasn't here tonight my words would just be on a sheet of paper or a voicemail. Although that's great opportunities for other people to contribute I think it means a lot more when we can stand in front of you and maybe you can feel our mana and maybe even see some of our tears, because I know I can't necessarily hold it in. As a first generation in Hawai'i, I feel like my duty is to support kanaka and perpetuate their voices, because my family is not from this place, and I am also a product of a Diaspora. You can see my hair. Obviously, I'm part African. And, you know, I don't have those connections to my homeland and my family, and that is a direct impact of colonization, which we all know is carried out predominantly in a lot of cases through the military. I just want to mention that there is some work being done, right, to restore this aina in part by organizations, maybe some funding by the military. I'm not sure how much you guys put in, but I know recently Mauna Kea Watershed Alliance was doing an outsizeing, and I will make this quick. There is a bird corridor, right? How are we supposed to have any effective bird corridor between two mana when there is something cutting them in half? So I just again appreciate everyone else who came before me. Any restoration is going to be undermined by continued desecration. So Mahalo.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Renee Winchester		<p>Pohakuloa is our hawaiian land, not military, please consider this</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
John Witeck		<p>I urge the Army to shut down Pohakuloa and clean up the wastes there and restore all 133,000 acres to civilian use--and to the indigenous people of Hawai'i. The military can find other training areas that don't involve squatting on and ruining the land of these islands. This land was taken without due process, without purchase, and through an executive order in 1964. This constituted an enormous theft. The U.S. government, via Congress and President Bill Clinton, apologized to Hawaiians for the illegal overthrow of the Hawaiian government. Now it's time that the lands taken from the Hawaiian people and used for military training and bombing be returned to native Hawaiians and the people of Hawaii as the island of Kahoolawe was some decades ago. Please do not allow the military's misuse of Pohakuloa and several other extensive sites in the islands to continue. Thank you for hearing my opinion on this matter. It is time do PONO, to make things right, and restore this land to peaceful, civilian uses.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Adriana Woods		<p>My name is Adriana Woods. I go by Luna. I am from Columbia, and I have lived here 12 years. I am also a U.S. citizen. I have blood on my hands. No. I pay taxes. I have blood on my hands. Do I choose to give my taxes to the U.S. Army? I do not. Neither do I choose to give it the Columbian Army, who has committed many atrocities. I have been to 34 countries, and I chose to come to this country, the Hawaiian kingdom. Mahalo nui loa. Aloha kakou. I have aina, my husband and I. That was the dream. Three acres. We grow banana, pineapple. I work at Pahoa Elementary School. I'm a yoga instructor. I'm a performer, and I performed at the Hilo Palace Theater and inspired children to be dancers and acrobats. I have helped elderly people here to be flexible and work on their breath. I have picked up hitchhikers. I have been a hitchhiker before we had money here. We work hard. My husband is a carpenter. He builds homes for local people, not just tourists. I have earned it. It was not easy to move here. Even though I'm a U.S. citizen and (indiscernible).</p>	<p>Thank you for your comment. The Army understands its responsibilities for proper stewardship of the land and has the utmost respect for Native Hawaiians. Please see the revised Sections 3.3 and 3.4 (Biological and Cultural Resources) of the EIS and Appendix I for the CIA.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
Adriana Woods		<p>What have you done besides pollute? What have you done? Thank you for being here and listening. He's on his phone the whole time, this gentleman. Yes, you. You have been on your phone the whole time. You are not listening. MS. Okay. I'm sorry. But I feel like are you really listening? If you are, like the other man, what's really going to happen? I don't need to tell you what's going on this island. I have been here 12 years. And just like the Mainland, worse on the Mainland, there is so much gun violence with 15 shootings on the Mainland. Mainland, why do we call it the Mainland? Like this is its little finger. This is its own entity. I'm rambling. Okay. I will do research for a book. Okay? And in my book, it's a novel, I have been looking up Pohakuloa, and one thing it says if the depleted uranium gets to reach a very high temperature it can aerosolize the depleted uranium. ?I'm like, okay, (indiscernible) using now if create that high temperature. Maybe they are not that hot. But do you know what would cause that really high temperature? Do you know what you are on? Do you know? Have you seen the heart, the pu'uwai of this island and of all the islands? Pele, the lava. You don't think the lava is going to come and poosht, what's it going to do? It's going to obliterate your camp, whatever you have got going on. I mean, it could totally change. There is many kinds of uranium, you know that. I had to look it up. There are many kinds, and they could change, depending on if they get oxidized or not, if they lose an atom, they gain an atom, blah, blah, blah.</p>	<p>Section 3.5.4.12 includes references noting that the depleted uranium did not aerosolize upon impact and per DODD 4715.11 high explosive munitions are not permitted to be fired into the same area as the depleted uranium impact locations.</p> <p>Section 3.5.4.12 notes that the Army completed a 1-year airborne uranium monitoring program in 2009 to determine if depleted uranium has impacted local air quality. Total airborne uranium levels collected from 210 air samples at PTA were within the range of naturally occurring uranium in Hawaiian soils and rock and were several orders of magnitude below the U.S. and international chemical and radiological health guidelines; therefore, the depleted uranium has not impacted local air quality.</p> <p>Section 3.6.4 discusses fugitive dust monitoring for depleted uranium at PTA, which concluded that depleted uranium has not impacted air quality at PTA or in the surrounding areas.</p> <p>Analysis of effects of volcanic activity on the impact area is beyond the scope of the EIS.</p>
Adriana Woods		<p>Anyway, all I want to say is I see Pohakuloa as like a system of trails, like in the Alps, like this is the alps in Europe, and they have these trails where tourists can walk, stay at a cabin, get some really good local food and then keep walking or bicycling to the next cabin. There could be hunting and tourism that's healthy not just people driving around, going to resorts and leading unhealthy lives of just getting drunk and being tourists. And that's the other side of this issue is tourism. You know, my mom has lived on Maui for 20 years, and I couldn't even be there without trespassing on somebody's resort. I couldn't even go park anywhere without trespassing because tourists are there, and they have priority over residents, who are just Paho school teachers and yoga teachers and carpenters and farmers and whatever you all do that's honest. I don't understand. But I just thought I we give my two cents, because -- Yeah, so kapu. I think there is a sign, I saw it somewhere on your land -- not your land. On the land that you are leasing for a dollar, which is some sort of sick joke. But the sign sets kapu. Kapu. The military sign says kapu, but the military sign is using an olelo word, which means sacred, and it means holy, and it means no trespassing. That is so fucked up. That's really weird that you are using the word kapu. Like the only word you know is no, no trespassing. I would love to see Pohakuloa turn into a system of hiking trails like in the Alps. That's my dream. I'm setting that intention. Mahalo.</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Amy Woods		<p>I do not approve of the military's intention to keep using these lands. The eco system in Hawai'i is so fragile and we must do everything possible not to continue the degradation and desecration of the native lands and animals here. We must immediately start to restore the land</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Janice Workman		<p>Stop the desecration on pohakaloo</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>
Rocio Yao		<p>Military training is hurting the land! Please demilitarize Hawai'i</p>	<p>Thank you for your correspondence. Your comment has been noted. Please see General Response 1.</p>

## Responses to Draft EIS Comments

Commenter	Submitted By	Comment	Response
S Yee		<p>The 133,000-acre Military Toxic Area (PTA) is located in the center of Hawaii Island at an elevation of 6500 feet. It's an area that has been bombed and abused by all branches of the US military for more than 70 years. Millions of live-rounds are fired annually at PTA. A wide range of toxins, including Depleted Uranium (DU) radiation, have been spread throughout the land. All of us on the Big Island, residents and visitors alike, people, plants and animals, are downhill and downwind from PTA.</p> <p>Of the 133,000-acres at PTA, the military wants to renew a State lease of 23,000 acres. The bulk of the land at PTA, more than 84,000-acres were simply seized by a presidential executive order. I say NO to the lease renewal. I say yes to require a comprehensive independent assessment of the toxic military mess at PTA, guaranteed federal funds to do a thorough clean up, and the shut down and return of the entire 133,000-acres to the Hawaiian people. Enough is enough! Bombing the aina is the ultimate desecration. I urge others to express their thoughts publicly, and to the military Environmental Impact Statement (EIS) process</p>	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Unidentified Caller		Hi. A couple of issues about noise remediation. I am thinking that we should be pushing for perhaps outside-the-box thinking, if there is a way that they can train people using virtual explosions instead of real ones so that they are not dislodging things underground and so that they don't scare us, who live in Waikolao and Kukio,	EIS Section 1.1.3 refers to an analysis that concluded computer-based simulation training is not an adequate substitute for live training.
Unidentified Caller		and so that they are not leaving more depleted uranium or whatever all you were leaving there in the area, because anything that is not made out of lava is a newly introduced substance that has to be cleaned up. So that is one of my main concerns. And the other aspect is cleaning up what's already there. I understand there is some depleted uranium. The EIS is very vague about what it says it's going to do to deal with that. I think that's it. Thanks.	<p>Depleted uranium, which is outside of the State-owned land, would continue to be managed under the Nuclear Regulatory Commission license.</p> <p>Section 3.5.4.12 notes that the Army completed a 1-year airborne uranium monitoring program in 2009 to determine if depleted uranium has impacted local air quality. Total airborne uranium levels collected from 210 air samples at PTA were within the range of naturally occurring uranium in Hawaiian soils and rock and were several orders of magnitude below the U.S. and international chemical and radiological health guidelines; therefore, the depleted uranium has not impacted local air quality.</p>
Unidentified Caller		Aloha. I'm a Hawaiian citizen calling to submit my comment on using the Pohakuloa as a military training area. It has a significant adverse impact on our aina and our cultural practices and resources.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.
Unidentified Speaker		I come to speak against your presence here. I think that you know what you are doing is wrong. Thank you.	Thank you for your correspondence. Your comment has been noted. Please see General Response 1.

# **Responses to Second Draft EIS Comments**



## Appendix D

# RESPONSES TO SECOND DRAFT EIS COMMENTS

This appendix contains all public and government agency comments submitted during preparation of this EIS, and responses to the comments. Section 1.6 of the EIS summarizes the public input process for the EIS. The 45-day public comment period for the Second Draft EIS began on April 19, 2024 and ended June 7, 2024. Oral and written comments were received. Following the guidance in the NEPA and HEPA regulations for EIS public input, the EIS preparers reviewed all submissions and identified substantive comments. Responses have been prepared for the substantive comments, and where substantive comments were used to refine text in the EIS is generally noted in the responses.

Commenters are directed to **General Response 1** for comments not considered to be substantive, which acknowledges that the comment was received and reviewed.

### **General Response 1**

Thank you for providing input to the ATR PTA Second Draft EIS. Your comment has been made part of the Administrative Record for this EIS. The Second Draft EIS was prepared to analyze the potential environmental impacts of the Proposed Action and alternatives presented, based on public comments during the scoping process and First Draft EIS. In determining whether a comment on the Second Draft EIS is substantive, the EIS preparer considered the validity, significance, and relevance of the comment to the scope, analysis, or process of the EIS (HAR Section 11-200.1-26[a]). For the Second Draft EIS, comments considered substantive and provided with specific responses are those that pertain to the Proposed Action, submitted alternatives, information, and analyses and the summary thereof; present new, reasonable alternatives or changes to an alternative; provide new information relevant to the analysis; question the accuracy of specific information and provide a rationale for questioning accuracy; or question the methodology and/or assumptions used in the analysis and provide support with specific reasons to question the methodology.

Statements not considered to be substantive received this general response because they do not pertain to the Proposed Action or alternatives; pertain to locations or activities at PTA, but outside of State-owned Land; pertain to impacts associated with activities at PTA, but outside of State-owned Land and not associated with the proposed land retention action; comment about general military policy, actions, or impacts; comment on landownership issues outside the context of State and federal laws; recommend use of land that does not support the purpose and need; or provide broad, open-ended questions.

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
Francisco Doney	U.S. Environmental Protection Agency, Region 9	This “Second Draft EIS” presents a refined Proposed Action from that published in the PTA DEIS that seeks to retain approximately 250 fewer acres of State-owned land administered by the Department of Hawaiian Home Lands. The Second DEIS evaluates 3 alternatives in addition to the No Action Alternative and has identified Alternative 2 – Modified Retention, as the preferred alternative. Under Alternative 2, the Army would retain approximately 19,700 acres (86 percent) of the State-owned land at PTA, including all U.S. Government-owned facilities, utilities, and infrastructure within the State-owned land retained. Our comments on the original DEIS noted that the DEIS did not evaluate or specify how impacts would differ among the potential land retention estates (title, lease, easement, and license) and we suggested some resource areas where such a distinction might prove useful for informing the negotiations with the State of Hawaii that will occur after the NEPA/HEPA process is complete. We appreciate that the Second DEIS analyzes impacts of not just a fee simple retention method, but also a lease retention method, consistent with our recommendation.	Please see General Response 1.
Francisco Doney	U.S. Environmental Protection Agency, Region 9	Review Summary The Second DEIS is primarily a disclosure document for a real estate action to be negotiated with the State of HI. As such, EPA did not identify significant public health, welfare, or environmental quality concerns to be addressed in the Final EIS. For your consideration, we have additional recommendations to enhance disclosure and further distinguish impacts among the two land retention methods with regard to munitions and other contamination. See attached detailed comments. The EPA appreciates the opportunity to review this second DEIS for the Army Training Land Retention at Pōhakuloa Training Area.	Please see General Response 1.
Francisco Doney	U.S. Environmental Protection Agency, Region 9	Climate change We appreciate the additions to the second DEIS that addressed our comments on greenhouse gas emissions and climate change, including drought, wildfire risk, and localized air quality effects.	Please see General Response 1.

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
Janet Whitlock	U.S. Department of the Interior	<p>Conclusion</p> <p>The Department recognizes the importance of PTA in meeting the Army’s mission of readiness in support of our national defense. We appreciate the opportunity to provide comments on the DEIS.</p>	Please see General Response 1.
Francisco Donez	U.S. Environmental Protection Agency, Region 9	<p>Recommendation: In the Final EIS, provide a more detailed discussion of the specific measures that are included in the SOPs relevant to range clearance actions and frequency, for the protection of soil and groundwater quality, and whether compliance with SOPs is tracked. We recommend including the SOPs in the appendices or on the project website. If a range operation clearance plan exists, include this also.</p>	<p>Section 3.5.4.14 summarizes existing management measures with respect to hazardous substances and hazardous wastes.</p> <p>There is no particular range operations clearance plan because there are range-specific clearing procedures for the ammunition holding areas, Battle Area Complex, bivouac areas, firing points, forward operating bases, military operations on urban terrain facility, forward arming and refueling points, and each range.</p> <p>Section 3.5.4.14 expanded with information about how the Army tracks compliance with the SOPs. Appendix E expanded with a summary of the dig/excavation requirements, environmental compliance requirements, and range clearance procedures in the SOPs.</p> <p>The USAG-PTA External Standard Operating Procedures and the Pohakuloa Training Area Range Operations Standard Operating Procedures are internal documents that are not available for public disclosure. Appendix E includes relevant information from the SOPs. The Freedom of Information Act (FOIA) Library and FOIA Request process are available at:  <a href="https://www.rmda.army.mil/foia/RMDA-FOIA-Division.html">https://www.rmda.army.mil/foia/RMDA-FOIA-Division.html</a>.</p>
Francisco Donez	U.S. Environmental Protection Agency, Region 9	<p>Recommendation: Discuss how feasibility and practicability will be assessed regarding cleanup and restoration activities so the likelihood of these measures being implemented is disclosed, 2 consistent with Council on Environmental Quality Guidance. We recommend an evaluation and cleanup commitment, prioritizing State land not retained, so that this land is available for use by Hawaiians in a reasonable timeframe. There are 11 sites on or adjacent to the State-owned retained land that have</p>	<p>The extent to which cleanup could be accomplished within technical and economic capabilities is subject to several items such as negotiation with the State, regulation changes (e.g., future regulatory requirements), and future cleanup processes and costs. Section 5.2.4 revised with text regarding uncertainties associated with technical and economic capabilities for future cleanup. Section 3.5.6 describes the cleanup activities to be performed on any State-owned land not retained. The</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>potential to have hazardous substances or petroleum products (p. 4-12). For these areas, we recommend, at a minimum, controlling stormwater run-on and runoff to reduce potential for off-site migration.</p>	<p>Army follows the same regulations and standard operating procedures on U.S. Government-owned land as on State-owned land. See Sections 3.9.2 and 3.9.4.6 for regulatory framework and existing management measures for water resources. In addition, Section 3.9.4.3 discusses that stormwater runoff infrequently occurs within the State-owned land of PTA because runoff tends to infiltrate rapidly into crevices in the highly permeable lava flows.</p>
<p>Francisco Donez</p>	<p>U.S. Environmental Protection Agency, Region 9</p>	<p>Off-site migration of munitions constituents                      The Second DEIS states that release mechanisms for potential contamination from training activities may include off-range flow of surface water, erosion, and deposition (via surface water) of soil, and infiltration into groundwater, if SOPs and BMPs are not followed (p. 3-91). Again, these SOP practices that prevent migration are not identified. The impact assessment relies on statements that contaminant infiltration into groundwater is unlikely due to the low rainfall in the area and the considerable depth to groundwater, and that the pathway for leaching to groundwater is considered incomplete; however, we were unable to determine whether these assumptions had been confirmed through sampling and analysis, perhaps through a past Operational Range Assessment. While depth to groundwater may be considerable, the PTA area exhibits high soil permeability (p. 3-102). Perchlorate compounds are commonly released from the use of pyrotechnics (p. 3-99) within the approved portions of State-owned land (p. 3-98), and we note that perchlorate is very soluble and exhibits little to no soil adsorption. Recommendation: In the Final EIS, discuss off-site migration of munitions constituents and identify the SOPs that are preventing the release mechanisms identified above. Indicate whether any studies or operational range assessments have occurred that included sampling and analysis of surface water during flows, or of groundwater, including the localized perched aquifer and more regional high-level aquifer present at PTA, to confirm assumptions made regarding contaminant transport. Address soluble munition constituents such as perchlorate. We</p>	<p>Sections 3.5.4.11 and 3.5.4.12 describe the lack of mobilization of munitions constituents within soil, groundwater, and surface water. The text notes the risk of contaminants mobilizing is limited. The information on limited surface water and groundwater pathways and migration of munitions constituents was taken from the Phase I Environmental Condition of Property, as referenced in Section 3.5.4.11.</p> <p>As noted in Section 3.5.4.11, soil sampling has not been performed on all the training areas, firing points, and ranges to determine the presence or absence of munitions constituents. Section 3.5.2 revised to clarify that the entirety of the State-owned land, including where live fire currently is not conducted, remains in use by the Army for training activities and is considered an operational range. After training activities cease and the range is closed, the Army would address MEC through the Military Munitions Response Program, CERCLA, and the terms of the lease. Section 3.5.6 describes the lease compliance actions and cleanup and restoration activities to be performed on any State-owned land not retained.</p> <p>Section 3.5.2 revised to add the definition of operational ranges.</p> <p>Section 3.5.4.14 contains existing management measures with respect to hazardous substances and hazardous wastes. Appendix E provides further details on these existing management measures. Text regarding the existing management measures added to Appendix E.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>recommend consideration of groundwater sampling and analysis at range boundaries to confirm assumptions that pollutant migration is not occurring, or if it is, to better understand the baseline conditions should a new lease be executed</p>	<p>The best available scientific data for groundwater and surface water quality was incorporated into this EIS. Section 3.9.4.6 documents the existing management measures used by the Army to protect water resources. The State Department of Health (DOH) Safe Drinking Water Branch (SDWB) monitors groundwater quality of aquifers as described in Section 3.9. The DOH SDWB has released groundwater contamination maps for Hawai'i Island that show most contamination is along the eastern coast of the island. The DOH SDWB Environmental Health Portal is available at <a href="https://eha-cloud.doh.hawaii.gov/sdwb/#!/home">https://eha-cloud.doh.hawaii.gov/sdwb/#!/home</a>.</p>
Francisco Donez	U.S. Environmental Protection Agency, Region 9	<p>Cultural Resources and Environmental Justice We appreciate the revisions to the Second DEIS to better characterize the continued effects on Native Hawaiian communities in the broader context of historic inequities, cultural land values, and access to traditionally important sacred sites, consistent with our comments. Table 3-27, which documents the community outreach that occurred, is a good addition, as is the summary of information obtained from interviewees on p. 3-77. We appreciate that the Army is considering a formal cultural access request process so Native Hawaiians and cultural practitioners can preserve cultural practices, beliefs, and resources, and could also provide unlimited cultural access to specific locations. We have one minor comment regarding Section 3.11.5 – Methodology and Significance Criteria for the environmental justice analysis. The criteria considered to assess potential significant impacts on environmental justice include disproportionately high negative effects on minority populations and/or low-income populations (p. 3-198). Under Executive Order 14096 – Revitalizing Our Nation’s Commitment to Environmental Justice for All, environmental justice is now evaluated based simply on disproportionate and adverse impacts affecting communities with environmental justice concerns. We note that disproportionately high was not used elsewhere, so this may have been included in error. Recommendation: In the FEIS, correct the terminology</p>	<p>Section 3.11.5 text revised per comment recommendation.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>regarding methodology and significance criteria for the environmental justice analysis on p. 3-198 to reflect disproportionate and adverse impacts, and consider any adjustments to the EO 14096 listing in Table 3-23.</p>	
Francisco Domez	U.S. Environmental Protection Agency, Region 9	<p>EPA'S DETAILED COMMENTS ON THE SECOND DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE ARMY TRAINING LAND RETENTION AT PŌHAKULOA TRAINING AREA, HAWAII – June 5, 2024 Munitions constituents</p> <p>We appreciate that the second DEIS attempts to distinguish how impacts might differ for retention under fee simple title versus a new lease, consistent with our recommendation. As the document acknowledges, the difference between these land retentions is that under a new lease or easement, the Army would adhere to lease/easement conditions, assumed Army obligations due to the Court-Ordered Management Plan, and applicable State processes/administrative requirements. It is difficult to know what a future lease might include, but the EIS process can identify whether existing practices are protective and what additional practices are available that might provide additional protection. As such, it is important to identify these practices. The Second DEIS states that the Pōhakuloa Training Area Range Operations Standard Operating Procedures and the USAG-PTA External Standard Operating Procedures contain requirements for range operations, maintenance, and clearing (p. 3-98). These SOPs were not included in the DEIS or appendices, so it is not clear what practices are used on the active ranges to prevent accumulation of munitions constituents. The Second DEIS discusses actions that occur when suspected unexploded ordinance (UXO) is found, including potential blow-in-place detonation, and discloses the munitions constituents left behind that are a potential threat to soil and groundwater, but how often this kind of range clearance occurs is not presented. Our understanding is that the costs of finding and removing or detonating UXO are high, that it occurs as funding is available and not necessarily on a regular basis, and that per DODI 3200.16 (April 21, 2015), the extent of</p>	<p>As noted in Section 1.5.2, State decisions following acceptance of the EIS may include the land retention estates and methods as well as associated terms (e.g., lease conditions) in any new real estate agreement. Sections 3.5.6.1, 3.5.6.2, and 3.5.6.3 state that for all State-owned land retained by lease it is assumed that DLNR would continue to implement the COMP or develop and implement a revised lease compliance monitoring plan to confirm lease compliance, particularly with respect to military munitions and MEC.</p> <p>Section 3.5.4.14 summarizes existing management measures with respect to hazardous substances and hazardous wastes. Section 3.5.4.14 expanded with information about how the Army tracks compliance with the SOPs. Appendix E expanded with a summary of the dig/excavation requirements, environmental compliance requirements, and range clearance procedures in the SOPs.</p> <p>The USAG-PTA External Standard Operating Procedures and the Pohakuloa Training Area Range Operations Standard Operating Procedures are internal documents that are not available for public disclosure. Appendix E includes relevant information from the SOPs. The Freedom of Information Act (FOIA) Library and FOIA Request process are available at: <a href="https://www.rmda.army.mil/foia/RMDA-FOIA-Division.html">https://www.rmda.army.mil/foia/RMDA-FOIA-Division.html</a>.</p> <p>Section 3.5.4.11 revised to indicate UXO disposal occurs when an item is determined to present an imminent health and safety concern.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		operational range clearance will be balanced with mission risk and cost considerations. If this is the case for PTA, a lease condition that requires a more robust range clearance schedule could result in differing effects on resources affected by munitions constituents.	
Francisco Donez	U.S. Environmental Protection Agency, Region 9	Munitions and hazardous substances cleanup The DEIS states that there is the potential for munitions and explosives of concern to be found anywhere on the State-owned land, and that the land not retained under the preferred alternative 2 (3,300 acres) is rarely used for military training but does include 3 firing points (p. 3-110). There is some uncertainty regarding cleanup of this land not retained. The DEIS indicates that the Army would conduct various lease compliance actions, such as removing any weapons and spent shells within the State-owned land not retained, to the extent feasible (p. 3-110, emphasis ours). Additionally, the Army would determine how and when cleanup and restoration activities would occur, to the extent practicable. It appears that a clear commitment to cleanup activities is not presented.	Section 3.5.2 revised to add the definition of operational ranges. Section 3.5.6 revised to indicate the State-owned land retained would remain an operational range for the foreseeable future, deferring site restoration under the Military Munitions Response Program until after range closure. Text has been added to note the State-owned land not retained would no longer be an operational range after the lease expires and the land would be removed from the Army's inventory of operational ranges. At that time, the Army would conduct site restoration in accordance with the Military Munitions Response Program, CERCLA, and the terms of the lease. Following completion of lease compliance actions and cleanup and restoration activities, the Army would remain responsible for disposing of any MEC that is incidentally found on the State-owned land not retained due to the DoD's live-fire military training at PTA. The added text clarifies the Army's commitment to cleanup and restoration activities on State-owned land not retained.
Janet Whitlock	U.S. Department of the Interior	ESA Compliance Impacts of the Army's ongoing activities on threatened and endangered species and designated critical habitat are addressed by existing consultations in accordance with section 7 of the ESA (Enclosure 1). The existing consultations also describe agreed-upon conservation measures for threatened and endangered species and designated critical habitat that the Army is required to implement in association with its ongoing activities. The Department recommends the Army consider re-initiation of consultation in accordance with section 7 of the ESA regarding any changes to the Army's ongoing activities (e.g. military training and operations, conservation measures, etc.) and associated impacts to threatened and endangered species and their habitats as a result of the outcome of the proposed land retention	The Army notified USFWS immediately on July 21, 2022, when the Leilani fire started. In compliance with the 2003 BO, the Army provided the USFWS with information about the Leilani fire impacts (discussed in Section 3.3.4.2) in May 2023, with additional information provided in October 2023 and April 2024. The Programmatic Biological Assessment will be a comprehensive document to address current and foreseeable actions that require formal consultation under Section 7 of the Endangered Species Act.  Additional information has been added to Section 3.3.4.1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>action. We also acknowledge that the Army is currently preparing a draft Programmatic Biological Assessment which will address ongoing Army activities on U.S. Government- and State-owned land at PTA.</p>	
Janet Whitlock	U.S. Department of the Interior	<p>Section 3.3.5: Methodology and Significance Criteria (Page 3-54): In the discussion of Land Not Retained, the DEIS includes the following statement: "The Army would need to re-initiate consultation with USFWS regarding the BO conservation measures for this area." The Department recommends including this statement in the assumptions for environmental analysis for State-owned land not retained. The criteria presented here are not mentioned in DEIS Section 3.3.6: Environmental Analysis. We also recommend providing a description or justification in the discussion of (negligible), minor, moderate, and significant impacts. The Department believes that significant adverse impacts to Federal or State protected species could occur in instances when less than 20 percent of the species population occurrence found on installation experience a reduction of populations (numbers of individuals) or the distribution of protected species populations. By definition endangered species are at risk of extinction. A majority, if not all threatened and endangered species at PTA exhibit declining trends due to ongoing threats and stressors. For species with uneven spatial distributions, significant adverse impacts to protected species may also occur at levels less than 20 percent. For protected species with a large percentage of their total statewide population found within the PTA action area, significant adverse impacts would occur in the event of a loss of individuals or reduction in distribution.</p>	<p>The assumptions in section 3.3.5 apply to all alternatives, not just the No Action Alternative. The re-initiation of consultation with USFWS requirement only applies to the No Action Alternative, and would not be appropriate to the action alternatives.</p> <p>The "Level of Significance" at the end of each alternative refers to the significance criteria in Section 3.3.5.</p> <p>Section 3.1.4 provides descriptions used to classify the intensity of impacts.</p> <p>The 20% of the species assumption was included to be consistent with the draft programmatic Biological Assessment currently being developed, which is anticipated to be completed by end of 2025. The Army acknowledges that there may be cases where species are still at risk below a 20% threshold, and provide management actions. The 20% threshold was set for the draft programmatic Biological Assessment to identify species that need additional, species-specific, conservation measures.</p>
Janet Whitlock	U.S. Department of the Interior	<p>Specific Comments Section 3.3: Biological Resources, Wildland Fire Management (Page 3-34) Wildland fire is a major threat to State-owned lands leased by the Army and other surrounding lands including Forest Reserves and most importantly Palila (Loxioides bailleui) Critical Habitat (CH). The 2021 Keamuku Fire burned into Palila CH including areas sometimes occupied by Palila. The entire population of Palila are restricted to the west slope of</p>	<p>The Army appreciates USFWS collaboration offer. Section 3.3.4 and Appendix K have been updated with more recent scientific data and surveys and wildland fire analysis in Section 3.3.6 has been revised. Mitigation measures the Army would consider include: (1) a multi-year research project to identify possible biological controls in the native range of C. setaceus (fountain grass); (2) installation invertebrate surveys; (3) an</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>Mauna Kea and are extremely vulnerable to an extinction event such as a wildland fire, as happened in 2021. The Service is willing to work collaboratively with the Army and provide technical assistance in support of wildland fire management.</p>	<p>ungulate impact assessment; (4) negotiation of an agreement with the State to monitor wildfires on land not retained; and (5) implementation of additional thermal technology. These mitigation measures have been added to the Mitigation Measures subsection. The Army notified USFWS immediately on July 21, 2022, when the Leilani fire started. In compliance with the 2003 BO, the Army provided the USFWS with information about the Leilani fire impacts (discussed in Section 3.3.4.2) in May 2023, with additional information provided and in October 2023 and April 2024. Additional information has been added to Section 3.3.4.1 regarding consultation as a part of the draft Programmatic Biological Assessment, for which consultation with USFWS is anticipated to be completed by end of 2025.</p>
Janet Whitlock	U.S. Department of the Interior	<p>Section 3.3: Biological Resources, Leilani Fire (Page 3-34): The Department recommends that the Army include all technical reports, after action reports, investigations into the cause and any corrective actions that are being applied as a result of the Leilani Fire.</p>	<p>The Army notified USFWS immediately on July 21, 2022, when the Leilani fire started. In compliance with the 2003 BO, the Army provided the USFWS with information about the Leilani fire impacts (discussed in Section 3.3.4.2) in May 2023, with additional information provided and in October 2023 and April 2024.</p> <p>Links to publicly available documents have been added to Chapter 6 of the EIS as well as the PTA EIS website (<a href="https://home.army.mil/hawaii/ptaeis/project-home">https://home.army.mil/hawaii/ptaeis/project-home</a>) under the “Documents” tab. The Freedom of Information Act (FOIA) Library and FOIA Request process are available at: <a href="https://www.rmda.army.mil/foia/RMDA-FOIA-Division.html">https://www.rmda.army.mil/foia/RMDA-FOIA-Division.html</a>.</p>
Janet Whitlock	U.S. Department of the Interior	<p>Section 3.3: Biological Resources, Ungulate and Small Mammal Control (Page 3-37): Although not on State-owned land, the Cantonment Area is a likely source population for feral cats whose range includes wildland areas on Government- and State-owned lands where listed seabirds, nene (<i>Branta sandvicensis</i>), and native forests birds occur. The Department recommends feral cat control, efforts to contain garbage, and efforts to educate personnel not to feed feral cats in areas where food and water are readily accessible, such as the Cantonment Area.</p>	<p>PTA actively controls small mammal predators (cat, mongoose, and rodents) around select protected species to decrease depredation pressure using live and A24 traps. Over the 2022-2023 U.S. Army Garrison PTA Natural Resources Program reporting period 252 predators were controlled. The EIS text has been revised to reflect updated information.</p> <p>The Army Natural Resources staff briefs military unit leadership at the pre-deployment session to instruct</p>

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
			soldiers not to feed feral cats and to pick up all food trash to minimize vermin.
Janet Whitlock	U.S. Department of the Interior	Section 3.3: Biological Resources, Game Management Program (Page 3-37): During the 2023 Annual Integrated Natural Resources Management Plan Metrics Meeting, it was reported that the Game Management Program has not been fully operational in a number of years. Most units have not been open reliably, and there are few mammal hunting days available (not every weekend or holiday as described). Unmanaged ungulate populations present a threat to the surrounding forested lands including Mauna Kea Forest Reserve and Palila Critical Habitat. The large numbers of ungulates visible in areas along the Daniel K. Inouye Highway (DKI Highway) on State-leased lands and have led to extreme browsing of native trees and shrubs. Additionally, ungulates are often seen crossing DKI Highway and may present a safety risk to motorists. The Department recommends increasing public mammal hunting access to the maximum extent to assist with managing ungulate populations. We also recommend the Army works with the State of Hawaii to implement an ungulate control program.	<p>Sections 3.2.4.2 and 3.3.4.2 have been updated with additional information on public hunting and PTA game management. In compliance with the 2022 PTA hunting policy and iSportsman management, and pending training compatibility, the Army permits public hunting on PTA on weekends and national holidays.</p> <p>The Army has conservation law enforcement officers and game management support that work to control ungulates at PTA and support the hunting program. The Army has committed to mitigation measures to include an ungulate impact assessment as part of the Mitigation Measures subsection.</p> <p>Management of wild ungulates outside of the PTA boundary is beyond the scope of this EIS.</p>
Janet Whitlock	U.S. Department of the Interior	Section 3.3.6.1: Alternative 1: Maximum Retention, Land Retained (Page 3-54) Protected species include all Federal and State threatened and endangered species and those listed under the Migratory Bird Treaty Act, not only “the Hawaiian hoary bat and Hawaiian goose, as well as rare invertebrate species (confused helicoverpan noctuid moth, Kona yellow-faced bee, and yellow-footed yellow-faced bee)” as stated. The Department recommends removing this sentence to make references to protected species all inclusive. This comment applies to the analysis under the three action alternatives.	Section 3.3.6.1 and associated text has been revised per comment recommendations.
Janet Whitlock	U.S. Department of the Interior	Section 3.3.6.1: Alternative 1: Maximum Retention, Land Not Retained (Page 3-56): The DEIS considers impacts to vegetation for Land Not Retained, but not in Land Retained. The Department recommends impacts to vegetation be considered for both land retention categories. This comment applies to the analysis under the three action alternatives.	Section 3.3.6.1 and associated text has been revised per comment recommendations.

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
Janet Whitlock	U.S. Department of the Interior	Land Not Retained For any State-owned land not retained, the Department recommends that the Army coordinates cleanup and restoration activities with the Service to ensure protection of threatened and endangered species and the habitat which supports them, as well as perform cleanup and restoration activities to a standard which allows for access to conduct management activities for the conservation and recovery of threatened and endangered species in areas that support listed species. It may not be accurate to assume the State would continue current levels of species and habitat protections within State-owned lands not retained. First, based on the Army's ongoing training and operations, the Army may be required to continue to implement species and habitat protections on the land not retained. Second, existing State land management mandates and resources may not ensure continuation of the same levels of species and habitat protections in these areas.	<p>As noted in Section 2.1, in accordance with the lease and under the provisions of existing law, the Army retains responsibility for cleanup of closed ranges (i.e., State-owned land not retained). After the current lease expires, the Army would follow federal law and regulations to determine how and when cleanup and restoration activities for hazardous substances and MEC within the State-owned land not retained would occur under the CERCLA process.</p> <p>The Army cannot predict how the State could manage the State-owned land not retained, so the EIS assumes the State would continue current levels of species and habitat protections for analysis purposes. With the exception of the No Action Alternative, the Army expects that species and habitat protections would continue in accordance with the 2003, 2008, and 2013 Biological Opinions.</p> <p>The EIS text states that the Army would be responsible for any biological resources mitigation requirements that the Army negotiates with the USFWS and the State that require Army action in the State-owned land not retained.</p>
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	Table 3-10 under BMPs to prevent negative impacts on natural resources from construction activities, it states that "Any birds discovered in underground lava tubes..." It is unclear in what instance this would occur as under the USAG-PTA External Standard Operating Procedures it states that "caves, lava tubes, and overhangs are off limits." Please clarify the discrepancy.	<p>The BMPs to prevent negative impact on natural resources is specific to construction activities and the USAG-PTA External Standard Operating Procedures is about training. The Proposed Action does not include any construction activities, this section of the table is for awareness only.</p> <p>Additional clarification has been added to Table 3-12.</p>
Stacy Ferreira	Hawai'i State, Office of Hawaiian Affairs	OCCL further indicated that the Army's statement regarding a need for a discretionary permit from BLNR for continued military use in a conservation district is incorrect. OCCL went on to explain that a variance in existing uses on conservation lands would require a "request for temporary variance (less than 1 year)", a petition to the Land Use Commission (LUC) for a land use district boundary change, or initiation of a HAR	Section 5.3.2 has been revised-to remove language regarding a discretionary permit from BLNR.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>amendment. OHA noted similar concerns in our own letter and recommended consultation with OCCL on the matter. In response to OCCL’s comments, the Army says that “the EIS has been revised to describe current nonconforming use as well as the administrative process required to continue military use”. In this regard, the DEIS indicates that the Army will be seeking a rule change to the HARs. While OHA acknowledges that the Army has now provided the route that they will take in their attempt to permit continued military use on conservation lands, we still observe the EIS mentioning a discretionary permit from the BLNR for non-conforming conservation uses (see page 5-14). OHA recommends that the DEIS be revised to omit this statement, and to include mentioning that the Army has been corrected on this matter by the OCCL on what they specifically need to possibly enable continued military use on conservation lands. Any other discussions with the OCCL on this matter to ensure their concerns are adequately met and understood should be summarized or detailed within the DEIS as well.</p>	
<p>Ryan Kanaka’ole (K. Tiger Mills, Staff Planner - OCCL)</p>	<p>Hawai’i State, Department of Land and Natural Resources</p>	<p>The OCCL has reviewed the responses to our previous comments to the first EIS. The OCCL notes under Section 5.3 Consistency with other Federal, State, and County Land Use Plans, Policies, and Controls; Conservation District Rules, Hawai’i Administrative Rules Chapter 13-5, the EIS continues to incorrectly state: “Uses that are not listed require a discretionary permit from the BLNR.” Proposed land uses in the Conservation District must be an identified land use under the Hawai’i Administrative Rules (HAR) Chapter 13-5. The Department does not entertain applications for un-identified land uses. If a proposed land use is not present, an applicant can request a temporary variance [less than 1 year], petition the land use commission for a land use district boundary change, or initiate an administrative rule amendment to have the proposed use added to the identified land uses as long as the proposed use complies with the law.</p>	<p>Section 5.3.2 has been revised to remove language regarding a discretionary permit from BLNR.</p>
<p>Ryan Kanaka’ole (David G. Smith,</p>	<p>Hawai’i State, Department of</p>	<p>There is a need to establish additional fire suppression dip tanks to protect PTA and surrounding DOFAW-managed</p>	<p>The Army will take DOFAW's recommendations under advisement.</p>

**Responses to Second Draft EIS Comments**

<b>Committer</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
Administrator - DOFAW)	Land and Natural Resources	lands. PTA currently has 11 fire suppression dip tanks. DOFAW suggests installing tanks in the following locations: a. Below Pu'u Ke'eke'e in the bottom corner of TA 20 or off old Ke'eke'e road. b. Near the bottom of DKI on the south side of DKI adjacent to Pu'u Anahulu GMA. c. A dip tank in TA 1 that would serve the eastern portions of PTA and help to protect remaining unfenced areas of Palila Critical Habitat as well as the state lease lands in that vicinity. d. A tank near the Kilohana Girl Scout camp is at a high point where helicopters could fly with a full load of water down in elevation.	Additional information has been added to Section 3.16.4.
Kali Watson	Hawai'i State, Department of Hawaiian Home Lands	In 3-3, the SDEIS states: Following lease expiration and in accordance with the lease, or as otherwise negotiated with the State, the Army would conduct lease compliance actions and cleanup and restoration activities that could result in new short-term, negligible, adverse impacts on recreation from restricted public access. DHHL expects to be included in negotiation for "clean-up and restoration" in order to minimize potential impacts and requests that the applicant make contact with DHHL to begin these discussions. As the SDEIS states the approximately 250 acres of DHHL-administered land would not be retained for the PTA, the aforementioned plan for de-occupation and return of these lands to DHHL should include appropriate surveying, testing, and remediation of any hazardous or toxic materials at cost to the applicant prior to DHHL resuming site control. Any costs affiliated with these efforts should not be the responsibility of DHHL and should be thoughtfully and carefully completed by the applicant prior to site control being returned to DHHL.	Please see General Response 1.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	In Section 3.2.4.1, the ceded lands discussion should further elaborate that the Admission Act also included language that that lands no longer needed by the US should be conveyed to the State.	The discussion of ceded lands under Section 3.2.4.1 has been revised to include that the Admission Act provides that lands retained by the United States for its own use could later be returned to the State if those lands are no longer needed for federal purposes.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	Also, on page 3-16, the discussion on the Conservation District is inconsistent with other sections discussing the Conservation District. Throughout the document, the Army has acknowledged that military use is not an	The discussion of State Land Use Districts under Section 3.2.4.1 has been revised to be consistent with the discussion of Conservation District conformance in other areas of the EIS.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>identified land use and is therefore inconsistent with the Conservation District. However, this section does not make that claim, and rather states that “Army management programs are consistent with the purposes of HAR Chapter 13-5...” Please revise accordingly.</p>	
Kali Watson	Hawai'i State, Department of Hawaiian Home Lands	<p>DHHL is very concerned at the applicant's decision to avoid an updated air monitoring program. DHHL does not agree with this decision and as stated in previous comment letters, we feel strongly that water table testing and air quality testing should be part of a long-term monitoring program incorporated into the PTA activities. Annual reports of air quality monitoring and water table testing should be submitted to the State DOH and DHHL.</p>	<p>As stated in Section 3.6.4, a fugitive dust air monitoring program was implemented from January 2006 to January 2007, and the results concluded that there was a less than 0.1 percent chance that the federal and state ambient air quality standards for PM10 would be exceeded. The fugitive dust monitoring was discontinued because a year of monitoring found all levels to be well below the state and federal limits.</p> <p>There are no productive water sources on PTA. As stated in Section 3.9.4, an exploratory well on the PTA Garrison found water at 700' and 1800' below ground surface, the first being a perched aquifer and the latter being a deeper aquifer. The deep aquifer was tested for chemical contaminants and none were found. A groundwater sample from the perched aquifer could not be collected due to the unstable nature of the formation at this depth of the exploratory well. The water quality was classified as good and usable for a drinking water source. The well has been capped.</p>
Stacy Ferreira	Hawai'i State, Office of Hawaiian Affairs	<p>Lease term options In response to OHA's comments noting a lack of shorter lease term options, the Army states that Alternative 6 includes a shorter lease term option. However, the Army goes on to state that this option has been dismissed; subsequently, a detailed environmental analysis of this alternative has not occurred. The Army cites an example of a 10-year lease as being problematic as they claim that 25 years is the minimum to permit permanent construction type projects.</p>	<p>Text added to Sections ES.6, ES.12, 2.1, and 5.2 to clarify that the Proposed Action does not include a defined land retention duration because that would be negotiated with the State following completion of the EIS. Section 1.3.3 discusses that to carry out military improvements or modernization efforts, a long-term interest (i.e., at least 25 years) in the land must be acquired.</p>
Kali Watson	Hawai'i State, Department of Hawaiian Home Lands	<p>In ES-11, the SDEIS states: The Army would consider the following mitigation measures to further reduce potential adverse impacts on cultural practices: (1) through consultation with Native Hawaiians and cultural practitioners, the Army would formalize a cultural access</p>	<p>The Army's mitigation measures for impacts to cultural practices are included in the Final EIS.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>request process to enable Native Hawaiians and cultural practitioners opportunities to promote and preserve cultural practices, beliefs, and resources; and (2) the Army would explore options to provide unlimited cultural access to specific locations to be determined in consultation with Native Hawaiians and cultural practitioners (Alternatives 1, 2, and 3). DHHL supports the above-mentioned mitigation measures. Furthermore, DHHL requests that the consultation mentioned above be a robust and meaningful consultation process that includes lineal and cultural descendants, native practitioners and the Hawaiian Homes Commission and its native Hawaiian beneficiaries. DHHL can offer guidance in appropriate outreach and engagement with the Hawaiian Homes Commission and DHHL beneficiaries and encourages the applicant to make contact with DHHL to begin these discussions as well.</p>	
Kali Watson	Hawai'i State, Department of Hawaiian Home Lands	<p>In Appendix C of the SDEIS includes a comment matrix with the comments submitted in previous DHHL correspondence regarding this project. That comment matrix includes a response to our previous comment that no water table testing is needed as there are no groundwater wells within the State-owned land or impact area and that PTA has no groundwater extraction wells. We believe that there is still a clear need for water table testing as there is potential for cumulative impact to the water table. This could even be just from the natural water cycle which includes percolation of rainwater that could carry contaminants into the aquifer.</p>	<p>Section 3.9.4.2 has been updated to include additional information from the Thomas (2019) report. A link to this report has been added to the PTA EIS website (<a href="https://home.army.mil/hawaii/ptaeis/project-home">https://home.army.mil/hawaii/ptaeis/project-home</a>) under the "Documents" tab.</p>
Mary Alice Evans	Hawai'i State, Office of Planning and Sustainable Development	<p>We acknowledge that the Second DEIS addresses many of the issues that are of programmatic concern for our office. As in the first DEIS (April 2022), this DEIS adequately addresses compatibility with land use controls such as: Hawai'i Revised Statutes (HRS) Chapter 205 (State Land Use laws); HRS Section 205-A-2 (Hawai'i Coastal Zone Management Program), HRS Chapter 226 (the Hawai'i State Planning Act); as well as assesses environmental issues of importance to our office such as surface water resources; water quality; and stormwater runoff mitigation.</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

Committer	Submitted By	Comment	Response
Stacy Ferreira	Hawai'i State, Office of Hawaiian Affairs	<p>Since the writing of our July 2022 letter to DLNR, a response was provided in December 2022, stating that “there will be venues where OHA will have an opportunity for input in the future”. As no invitations from DLNR have ever been received since, we assume that the opportunities provided are the same opportunities to the public despite OHA’s unique duties to the public land trust. This is unfortunate as OHA observes that separate offices and divisions under the DLNR (i.e., OCCL, Land Division) have similar concerns to our own regarding the first DEIS and its numerous insufficiencies. If DLNR is reluctant to call OHA to the discussion table, we thus call on the Army to be a leader in collaboration and invite OHA to discussions about lease renewal and the effect of implementation actions of the court ordered management plan for PTA on any new lease conditions. This is an opportunity for the Army to demonstrate a willingness to properly steward and maintain the public land trust in accordance with Hawai'i laws and in cooperation with a State entity created for the betterment of the indigenous peoples of Hawai'i – Native Hawaiians.</p>	Please see General Response 1.
Sven Lindstrom	Hawai'i State, Department of Health, Hazard Evaluation and Emergency Response Office	<p>1st draft comment: Although the lease agreement states that the Government will have 60 days to clean up unexploded ordnance (UXO) and munitions debris (MD) after surrendering the land back to the state, this is not sufficient time to conduct a thorough evaluation and cleanup of munitions hazards at the site. The HEER Office oversees clean-up activities at DoD sites in Hawaii under a DoD-State Memorandum of Agreement (DSMOA) Cooperative Agreement. The HEER Office does not oversee clean-up at active ranges. Cleanup of former munitions site under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) process required by DoD takes years, sometimes decades to complete. Investigation of potential munitions hazards and clean-up while the Army still controls the property is preferable so that the State will not be forced to wait an indeterminant amount of time to recover the property following the expiration of the lease agreement. The HEER Office recommends that language be included in the DEIS</p>	<p>Section 3.5.2 revised to add the definition of operational ranges.</p> <p>Section 3.5.6 revised to indicate the State-owned land retained would remain an operational range for the foreseeable future, deferring site restoration under the Military Munitions Response Program until after range closure. Text has been added to note the State-owned land not retained would no longer be an operational range after the lease expires and the land would be removed from the Army’s inventory of operational ranges. At that time, the Army would conduct site restoration in accordance with the Military Munitions Response Program, CERCLA, and the terms of the lease. Following completion of lease compliance actions and cleanup and restoration activities, the Army would remain responsible for disposing of any MEC that is incidentally found on the State-owned land not retained due to the DoD’s live-fire military training at PTA. The</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>to encourage the Army to begin munitions response activities on the state-owned land as soon as possible. In the event that the lease is extended, the HEER Office recommends that a requirement be included in the lease to conduct ongoing UXO investigations and clean up during the lease period and a final UXO cleanup prior to the return of the land to the State.</p> <p>Comment Not Resolved. There is no need for the Army to wait for the end of the lease period to address known and potential contamination under DERP/DSMOA/CERCLA. Sites identified in the first and second Draft EIS documents and in the ECOP that are on state land and no longer within currently active range locations should begin the cleanup process as soon as possible. These sites should be added to the current DSMOA Cooperative Agreement and documents should be submitted to the HEER Office for review and approval. Please address this comment in the final EIS. Where state lands may be retained, please recommend that investigation and cleanup of these areas be a requirement of the lease extension. Since both versions of the Draft EIS note that munitions and explosives of concern (MEC) hazards may be present anywhere within the State-owned land, please recommend that all State-owned land be investigated for MEC in cooperation with the HEER Office as soon as feasible.</p>	<p>added text clarifies the Army's commitment to cleanup and restoration activities on State-owned land not retained.</p>
Sven Lindstrom	Hawai'i State, Department of Health, Hazard Evaluation and Emergency Response Office	<p>Section 1.1.3 has the first mention of the Environmental Condition of Property (ECOP). Please include a reference to this document and include a link to access this document in the Supplemental Documents provided online.</p>	<p>The Phase I ECOP has been added to Chapter 6 of the EIS as well as the PTA EIS website (<a href="https://home.army.mil/hawaii/ptaeis/project-home">https://home.army.mil/hawaii/ptaeis/project-home</a>) under the "Documents" tab.</p>
Stacy Ferreira	Hawai'i State, Office of Hawaiian Affairs	<p>OHA recommends that the Army provide a link to a version of the second DEIS that contains highlighted or underlined revisions from the first DEIS to the general public as part of their online documents page (<a href="https://home.army.mil/hawaii/ptaeis/documents">https://home.army.mil/hawaii/ptaeis/documents</a>). This would perhaps make it easier for some readers to understand how the document evolved and to maybe see or focus better on areas of concern.</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
Stacy Ferreira	Hawai'i State, Office of Hawaiian Affairs	Previously, OHA had requested a withdrawal of the 2022 DEIS as it was unclear if the Department of Land and Natural Resources (DLNR) had begun to implement the court ordered management plan from the 2019 Ching v. Case Supreme Court ruling. OHA had rationalized that the State should not re-new another long-term lease or entertain the review of a DEIS seeking lease renewal without ensuring the condition of the State-owned lands first and obtaining agreement from the lessee that corrective actions would take place to mitigate any adverse effects. On the surface, it appeared to some that releasing the DEIS ahead of the implementation of court ordered actions was done to rush the process in a way that would minimize the importance of the court ordered actions during the lease renewal. While the DEIS was not withdrawn as requested, the release of a second DEIS two years later has resulted in the same outcome for all practical purposes as it was assumed that a withdrawal would've resulted in a revised draft EIS anyway. Essentially, a revised EIS only lends to the limited preparedness of the first DEIS and the need to release a second. As noted by the DLNR Land Division in their own comments to the Army, the DEIS was either insufficient or failed to meet basic Hawai'i Administrative Rules (HAR) requirements in 11-200.1-24(g), (i), (j), (k), and (l).	Please see General Response 1.
Stacy Ferreira	Hawai'i State, Office of Hawaiian Affairs	As stated in our written 2022 comments, OHA has been excluded from discussions regarding implementation of the DLNR management plan and lease renewal. This is unacceptable given our fiduciary duty to the public land trust and our statutory mandate. Notably, HRS 10-1(b) specifically indicates that it shall be the duty and responsibility of all state departments and instrumentalities of state government to actively work towards the goals of Chapter 10 and to assist the OHA wherever possible. So far, OHA is not seeing cooperation or assistance in regards to State-owned ceded lands currently leased by the Army. This is especially concerning since OHA also sent a separate letter directly to DLNR dated July 26, 2022, noting our concerns regarding the	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
Sven Lindstrom	Hawai'i State, Department of Health, Hazard Evaluation and Emergency Response Office	<p>lack of consultation with OHA on the care of public land trust ceded lands.</p> <p>Section 3.5.4.3, please discuss potential alternatives to the current burn pan that are less likely to result in contamination of the surrounding environment. Also, with regard to sampling conducted during the ECOP investigation, please clarify that the sampling procedures and analytical data were not presented to the HDOH for review and approval and that additional investigation in accordance with CERCLA is required at sites where screening level exceedances were detected before conclusions can be made about the level of risk at the site. That is to say, the ECOP is not the proper point in the CERCLA process to evaluate risk and potential pathways, that should be conducted in the Remedial Investigation/Feasibility Study (RI/FS) phase in cooperation with state regulators. Please make this clarification both here and globally across the document, where appropriate.</p>	<p>The current burn pan area is not on State-owned land and is still in use on an operational range. Discussion of alternatives to the current burn pan and cleanup under CERCLA is outside the scope of this EIS.</p>
Sven Lindstrom	Hawai'i State, Department of Health, Hazard Evaluation and Emergency Response Office	<p>1st Draft Comment: The DEIS references an Environmental Condition of Property (ECOP) study, but this document was not made available on the project website. The HEER Office requested this document from Army Garrison Hawaii, but it was not provided. According to the DEIS, the ECOP identified potential munitions-related hazards on the state-owned land, as well as other potential environmental hazards. The HEER Office recommends that the Army address all of these hazards and provide documentation to the HEER Office for our records. The sites that are described as former Munitions and Explosives of Concern (MEC) sites or ranges should be assessed and cleaned up under CERCLA since the Environmental Protection Agency (EPA) Military Munitions Rule only exempts operational ranges for EPA regulations. If a new lease is to be prepared for the state-owned land, the HEER Office recommends that a requirement of the lease include the identification and cleanup of all environmental hazards on the state-owned land.</p> <p>Comment Not Resolved. A copy of the ECOP has not been provided to the HEER Office. Please make a copy of the</p>	<p>A copy of the Phase I and Phase II ECOP documents have been provided to HEER. Section 3.5.2 revised to add the definition of operational ranges. Section 3.5.6 revised to indicate the State-owned land retained would remain an operational range for the foreseeable future, deferring site restoration under the Military Munitions Response Program until after range closure. Text has been added to note the State-owned land not retained would no longer be an operational range after the lease expires and the land would be removed from the Army's inventory of operational ranges. At that time, the Army would conduct site restoration in accordance with the Military Munitions Response Program, CERCLA, and the terms of the lease. Following completion of lease compliance actions and cleanup and restoration activities, the Army would remain responsible for disposing of any MEC that is incidentally found on the State-owned land not retained due to the DoD's live-fire military training at PTA. The added text clarifies the Army's commitment to cleanup and restoration activities on State-owned land not retained.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>ECOP available to the public and to the HEER Office for review and comment, along with other relevant site documents. The HEER Office should have been involved in the design of the investigations conducted during the ECOP to ensure they comply with HDOH guidance. The areas with identified contamination from the ECOP investigations require further investigation under CERCLA in coordination with the HEER Office. As stated above, there is no requirement for the Army to wait until the end of the lease period to begin investigating these sites under DERP/DSMOA/CERCLA. Given the length of time these investigations generally require, it is best to begin as soon as possible. Please include as a recommendation in the Draft EIS that if these investigations are not completed, any new lease extension should require the investigation and cleanup of these areas prior to the end of the new lease period. It is the understanding of the HEER Office that the Military Munitions Rule only applies to active range areas and does not cover the entire PTA property. Potentially contaminated areas described in the Draft EIS documents include historic firing points and ranges that are no longer being used and therefore should no longer be excluded from investigation and cleanup under the Military Munitions Rule.</p>	
Sven Lindstrom	Hawai'i State, Department of Health, Hazard Evaluation and Emergency Response Office	<p>First Draft Comment: Section 1.2.5 of the DEIS states that more than 20,000 acres of the state-owned land is designated as "maneuver area." The HEER Office recommends that this area be investigated for historic munitions use prior to the end of the lease and cleaned-up if necessary. In fact, Section 3.5.4.11 states that "there is a potential for MEC to be found anywhere on the State owned land," so this recommendation should extend to all the state-owned land. The HEER Office also recommends that any future lease include a requirement to investigate and cleanup munitions across the state-owned land, including at current and former maneuver areas, and to restrict future activities in maneuver areas on state land such that munitions use is not allowed or requires cleanup following use.</p> <p>Comment Not Resolved. See above. Although currently</p>	<p>Section 3.5.4.11 revised to indicate military munitions have been used at PTA prior to the current lease and as far back as World War II. The use of these military munitions prior to the current lease's range management requirements may have left behind MEC.</p> <p>Section 3.5.2 revised to add the definition of operational ranges.</p> <p>Section 2.1 states that after expiration of the current lease, the Army would follow federal law and regulations to determine how and when cleanup and restoration activities for hazardous substances and MEC within the State-owned land not retained would occur under the CERCLA process.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>the Army has protocols to conduct cleanup activities following munitions training activities, those protocols do not address historic contamination from past activities. Based on statements within the Draft EIS, it is reasonable to assume that stringent cleanup requirements were not always implemented at PTA and also that specific lease requirements regarding limits on the use of munitions may have been only loosely enforced. Please include a recommendation to begin investigations and cleanups in all areas of the property that are not currently active ranges covered by the Military Munitions Rule. In particular, all efforts should be made to thoroughly investigate and cleanup those areas of the property that are proposed to be returned to the state under the preferred alternative and recommendations should be made that any lease extension include a requirement for the timely investigation and cleanup of the remaining state-owned land as soon as possible. Also, please revise the text of the document to clearly state that while currently there are protocols in place that require the cleanup of training areas, this was not always a requirement at PTA and consequently, many areas may have contamination that has never been addressed</p>	<p>Section 3.5.6 revised to indicate the State-owned land retained would remain an operational range for the foreseeable future, deferring site restoration under the Military Munitions Response Program until after range closure. Text has been added to note the State-owned land not retained would no longer be an operational range after the lease expires and the land would be removed from the Army’s inventory of operational ranges. At that time, the Army would conduct site restoration in accordance with the Military Munitions Response Program, CERCLA, and the terms of the lease. Following completion of lease compliance actions and cleanup and restoration activities, the Army would remain responsible for disposing of any MEC that is incidentally found on the State-owned land not retained due to the DoD’s live-fire military training at PTA. The added text clarifies the Army's commitment to cleanup and restoration activities on State-owned land not retained.</p> <p>As noted in Section 1.5.2, State decisions following acceptance of the EIS may include the land retention estates and methods as well as associated terms (e.g., lease conditions) in any new real estate agreement. Sections 3.5.6.1, 3.5.6.2, and 3.5.6.3 state that for all State-owned land retained by lease it is assumed that DLNR would continue to implement the COMP or develop and implement a revised lease compliance monitoring plan to confirm lease compliance, particularly with respect to military munitions and MEC.</p>
Stacy Ferreira	Hawai'i State, Office of Hawaiian Affairs	<p>Concerns from OCCL In OCCL’s written comments to the Army, they wrote that they were “alarmed at the number of previous dump sites on State leased land” and that such facilities require a permit from the DOH. In response, the Army explained that the PTA-06 landfill was opened in 1979 and closed in October 1993 in accordance with Hawai'i Administrative Rules (HAR) 11-58.1-17. OHA observes that while the Army does not provide further information in their response to OCCL pertaining to the landfill, the DEIS mentions that the landfill is under a long-</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>term management plan and remains subject to a 5-year review under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). Further, existing management measures are briefly described in DEIS Section 3.8.4.4, with an indication that methane monitoring ceased as methane had not been detected over 8 different sampling events.</p>	
Stacy Ferreira	Hawai'i State, Office of Hawaiian Affairs	<p>Concerns from DOH In DOH's comments to the Army, we see that they had trouble requesting and obtaining an Environmental Condition of Property (ECOP) report done in 2015 for PTA. Per the DOH, the first DEIS mentioned that the "ECOP identified potential munitions-related hazards on the State- owned land, as well as other potential environmental hazards." In response, the Army provides a hyperlink to additional Army documents and mentions that documents are made available to the public "to the extent feasible". The Army mentions that the ECOP was prepared "to formulate an opinion of the environmental condition of the subject site (State-owned land leased by the Army)".</p>	Please see General Response 1.
Stacy Ferreira	Hawai'i State, Office of Hawaiian Affairs	<p>Overall presentation of EIS revisions OHA observes that the second DEIS is not done in Ramseyer format and does not highlight where changes have been made from the first DEIS. While the HARs only require that a Final EIS be written in a way that easily distinguishes where changes have been made, this is not true for any draft EIS that is released following revision from a previous draft. Despite technically being compliant with the HARs and electing not to highlight where changes have been made, it would have perhaps benefited many readers if the Army did highlight or underline where changes were made to the most recent draft. The current draft is quite lengthy and at times difficult to navigate on a computer due to the sheer size of the document.</p>	Please see General Response 1.
Stacy Ferreira	Hawai'i State, Office of Hawaiian Affairs	<p>Closing Remarks Mahalo for the opportunity to comment. OHA looks forward to seeing our comments taken into consideration, with meaningful revisions made to the DEIS. Given OHA's responsibility to our beneficiaries and the public land trust, we again further insist that OHA be</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>included in future discussions regarding implementation of the DLNR management plan and any consideration of lease renewal conditions made as a result of subsequent site inspections. And, to co-addressee Chair Chang, it is apparent to OHA that there are numerous concerns from various state entities regarding the lease renewal. Many of which are shared and highlighted above in our comments – especially those comments between OCCL, DOH, OHA, and even the DLNR Land Division. As such, we hope that concerned agencies can be directly invited to discuss these concerns openly with the BLNR or directly with you as the Chair of the BLNR as part of the lease renewal process. Together as unified State agencies, OHA believes there can be a greater chance of upholding the interests of the State, general public, and Native Hawaiians.</p>	
Sven Lindstrom	Hawai'i State, Department of Health, Hazard Evaluation and Emergency Response Office	<p>Section 3.5.4.13 states that the Army is in the process of finalizing a Preliminary Assessment and Site Inspection (PA/SI) report for PFAS at PTA. Please provide a draft of this document for review to the HEER Office prior to finalizing it. Also, please note that the HEER Office should have been provided with a draft SI Work Plan to review, prior to sampling, to ensure sampling procedures and data objectives comply with state sampling and PFAS guidance. A recent AFFF release at PTA has indicated that additional historic, unreported AFFF releases may have occurred that require further investigation. Additionally, there are other sources of PFAS other than AFFF, including but not limited to landfills and water treatment facilities that must be evaluated in the PA/SI. If these potential sources are not adequately addressed in the PA/SI, then HDOH will not accept the PA/SI. You state that "no PFAS-containing materials are known or suspected to have been used on the State-owned land", however, please note that the absence of records (i.e., "data gaps") is not sufficient to conclude that PFAS was not used since PFAS-containing products such as AFFF were not historically regulated. The presence of suspect areas, such as burn pans, that may indicate the use of AFFF, requires additional investigation. Please state in the EIS that additional investigation for</p>	<p>Questions or comments regarding the Preliminary Assessment/Site Inspection conducted by the Army under the Defense Environmental Restoration Program are outside the scope of the EIS; however, please note that the Preliminary Assessment/Site Inspection investigated other sources of polyfluoroalkyl substances (PFAS) than aqueous film-forming foam (AFFF), including metal plating operations, photo-processing areas, wastewater treatment plants, pesticides, and landfills. The areas identified for further investigation in a Remedial Investigation are on U.S. Government-owned land, not State-owned land.</p> <p>The Army has provided a copy of the final Preliminary Assessment/Site Inspection for PFAS at PTA to the HEER Office.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	<p>PFAS contamination on the state-owned land may be required.</p> <p>At this time, the Land Division suspects that even if all the deficiencies noted below were corrected, the revised document would be much different from this second version and the Draft EIS would need to be republished. Please be aware, should the Applicant choose to move forward with a Final EIS and not correct the deficiencies, the Department will have no other choice, but to recommend denial of the acceptance of the Final EIS before the Board of Land and Natural Resources.</p>	Please see General Response 1.
Mary Alice Evans	Hawai'i State, Office of Planning and Sustainable Development	<p>We note that Section 5.3.1, page 5-4 correctly identifies that this action may be subject to CZMA Federal Consistency as found in Title 15 Code of Federal Regulations (CFR) Part 930 Subpart C - Consistency for Federal Agencies. The DEIS states: "As a federal agency, the Army is required to determine whether its proposed activities would affect the coastal zone by evaluating the Proposed Action relative to the objectives and policies of the Hawai'i CZM program." OPSD is the lead state agency with the authority to conduct CZMA federal consistency reviews. As stated in the Second DEIS, the U.S. Army withdrew its first federal consistency applications for further evaluation after the release of the first DEIS. At the earliest opportunity, an authorized representative should contact our office on the policies and procedures related to CZMA federal consistency.</p>	CZMA consistency review has been initiated and will be completed prior to the ROD.
Stacy Ferreira	Hawai'i State, Office of Hawaiian Affairs	<p>Court ordered management plan In response to OHA's comments regarding implementation of the court ordered DLNR management plan, the Army claims that that DLNR inspections have since commenced and that DLNR has not issued any corrective actions. No further details are provided about these inspections. Its unclear to OHA if written comments are perhaps pending or if some discussions have taken place with perhaps some preliminary verbal comments. The DEIS does concede though that the lease may be subject to future negotiation based on obligations from the court order; thus, the possibility of corrective action remains in OHA's mind as well as perhaps any attentive reader. As such, the DEIS</p>	<p>Sections 3.2.4 and 3.5.4 state that the Department of Land and Natural Resources has implemented the Court Ordered Management Plan and site visits are occurring. The Army has received no corrective action requirements from the site visits. DLNR inspection reports have been added to the USAG-HI ATR PTA project website.</p> <p>Links to the reports have been added to Chapter 6 of the EIS as well as the PTA EIS website (<a href="https://home.army.mil/hawaii/ptaeis/project-home">https://home.army.mil/hawaii/ptaeis/project-home</a>) under the "Documents" tab.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		must provide further detail on DLNR site inspections (i.e., dates, times, noted concerns) and discussions, with a time-table of forthcoming site inspections and any pending release of DLNR written comments.	
Stacy Ferreira	Hawai'i State, Office of Hawaiian Affairs	The CIA makes this recommendation in the conclusion section, which is then carried forward to the body of the DEIS. OHA supports this recommendation for the crafting of a cultural access plan with Native Hawaiians and requests to be part of such consultations.	Thank you for your comment.
Stacy Ferreira	Hawai'i State, Office of Hawaiian Affairs	OHA notes that HAR 11-58.1-17 contains specific requirements for landfill closure and post-closure care that includes installing a final cover system, developing a written closure plan, certification of any closure plan by an independent professional engineer or approved by the DOH Director, the implementation of monitoring systems (i.e., ground water, air), and post-closure certification by an engineer or DOH Director. Its unclear to OHA why the Army is so quick to cite the applicable HARs for OCCL, but fails to elaborate specifically on how compliance is demonstrated. It would perhaps ease everyone's minds on this issue if the Army provided the post-closure landfill plan, any and all DOH certifications, and a direct mention of OCCL's concerns in the section of the DEIS that discusses landfill closure.	The Army coordinated with and received concurrence from HDOH for both the closure and post-closure management for the former landfill located on State-owned land. The Army continues long term management with oversight by HDOH. Documents related to the landfill closure and post-closure management can be found at the information repositories located at the Hilo Public Library, 300 Waianuenue Avenue, Hilo, Hawai'i 96720; and the Kailua-Kona Public Library, 75-138 Hualalai Road, Kailua-Kona, Hawai'i 96740.
Sven Lindstrom	Hawai'i State, Department of Health, Hazard Evaluation and Emergency Response Office	First Draft Comment: Figure 1-3 depicts many "Firing Points" located within the state-owned land, with the impact area located on Federal Government property to the south. According to Section 2.1.2, 91% of the firing points at the Pohakuloa Training Area are on the state-owned land. Munitions Constituent (MC) contaminants such as heavy metals, explosives, and propellants are often associated with firing points; discarded military munitions (DMM) can also sometimes be found at or near firing points. The HEER Office recommends investigating and cleaning up of these firing points prior to the end of the current lease period and, should the lease be extended, making ongoing investigation and cleanup of firing points a requirement of the new lease agreement. Comment Not Resolved. See above. There is no need to wait for the lease to end to initiate investigation and	Section 3.5.2 revised to add the definition of operational ranges. Section 3.5.4.11 provides information on current and past range management activities within the State-owned land. Section 3.5.6 revised to indicate the State-owned land retained would remain an operational range for the foreseeable future, deferring site restoration under the Military Munitions Response Program until after range closure. Text has been added to note the State-owned land not retained would no longer be an operational range after the lease expires and the land would be removed from the Army's inventory of operational ranges. At that time, the Army would conduct site restoration in accordance with the Military Munitions Response Program, CERCLA, and the terms of the lease. Following completion of lease compliance actions and cleanup and restoration activities, the Army

**Responses to Second Draft EIS Comments**

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		cleanup activities. Historic firing points no longer part of the active range are not covered by the Military Munitions Rule. Please recommend that these former firing points be investigated and cleaned up as soon as feasible, preferably before the current lease expires	would remain responsible for disposing of any MEC that is incidentally found on the State-owned land not retained due to the DoD's live-fire military training at PTA. The added text clarifies the Army's commitment to cleanup and restoration activities on State-owned land not retained.
Sven Lindstrom	Hawai'i State, Department of Health, Hazard Evaluation and Emergency Response Office	<p>First Draft Comment: Section 3.5.4 discusses the findings of the ECOP. Several of these sites, including the Former Bazooka Range(s), the Former Tank Gunnery Range, the Potential Former Burn Pan, and the Former Davy Crockett Weapons System Range are not in HEER Office's files. The HEER Office recommends that the Army provide documents for these sites to the HEER Office and engage the HEER Office regarding the investigation and cleanup of these sites. The HEER Office recommends that cleanup of all the sites in the ECOP on state-owned land, including potential depleted uranium contamination associated with the former Davy Crockett range, be conducted prior to returning the land to the State. The HEER Office further recommends that investigation and cleanup of these sites be prioritized in any new lease agreement.</p> <p>Comment Not Resolved. See above. There is no need to wait for the lease to end to initiate investigation and cleanup activities. Historic firing points no longer part of the active range are not covered by the Military Munitions Rule. Please recommend that these former firing points be investigated and cleaned up as soon as feasible, preferably before the current lease expires. With regard to active ranges with firing points on both state and federal property, HDOH would appreciate a collaboration with the Army to better understand how the Army is managing potential environmental contamination from its training activities. Please include that as a recommendation in the EIS as well.</p>	<p>Section 3.5.2 revised to add the definition of operational ranges.</p> <p>Section 2.1 states that after expiration of the current lease, the Army would follow federal law and regulations to determine how and when cleanup and restoration activities for hazardous substances and MEC within the State-owned land not retained would occur under the CERCLA process.</p> <p>Section 3.5.6 revised to clarify that following completion of lease compliance actions and cleanup and restoration activities, the Army would remain responsible for disposing of any MEC that is incidentally found on the State-owned land not retained due to the DoD's live-fire military training at PTA.</p> <p>Section 3.5.4.11 provides information on current and past range management activities within the State-owned land.</p> <p>The Army will coordinate its cleanup actions with the State of Hawai'i throughout the CERCLA process.</p>
Sven Lindstrom	Hawai'i State, Department of Health, Hazard Evaluation and Emergency Response Office	First Draft Comment: Table 3-24 describes conditions under Alternative 1 as "Adverse impacts from continued contamination but minimized with the management of MEC and radioactive contaminants." Please include a description of current management of MEC and radioactive materials on the state-owned land. Previous	Section 3.5.4.11 revised to indicate military munitions have been used at PTA prior to the current lease and as far back as World War II. The use of these military munitions prior to the current lease's range management requirements may have left behind MEC. Section 3.5.2 revised to add the definition of operational ranges.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>descriptions of these hazards did not describe any active management of these hazards other than possibly restricted access. Comment Partially Resolved. On the subject of managing MEC, Section 3.4.11 discusses the handling of munitions brought to the property and management protocols at active ranges, but does not address MEC hazards from historical activities. It bears noting that in December 2022, during the Mauna Loa volcanic eruption, an unexploded ordnance (UXO) item was reportedly discovered near an area of PTA that was opened to the public for viewing the lava flow. It is not clear that PTA has any program in place for the management of historic MEC that the DEIS states may be present "anywhere" on the property. Please include recommendations for management of historic MEC across the site and/or provide a description of what management protocols are currently in place to address this hazard</p>	<p>Section 2.1 states that after expiration of the current lease, the Army would follow federal law and regulations to determine how and when cleanup and restoration activities for hazardous substances and MEC within the State-owned land not retained would occur under the CERCLA process. Section 3.5.6 revised to indicate the State-owned land retained would remain an operational range for the foreseeable future, deferring site restoration under the Military Munitions Response Program until after range closure. Text has been added to note the State-owned land not retained would no longer be an operational range after the lease expires and the land would be removed from the Army's inventory of operational ranges. At that time, the Army would conduct site restoration in accordance with the Military Munitions Response Program, CERCLA, and the terms of the lease. Following completion of lease compliance actions and cleanup and restoration activities, the Army would remain responsible for disposing of any MEC that is incidentally found on the State-owned land not retained due to the DoD's live-fire military training at PTA. The added text clarifies the Army's commitment to cleanup and restoration activities on State-owned land not retained.</p>
Sven Lindstrom	Hawai'i State, Department of Health, Hazard Evaluation and Emergency Response Office	<p>Section 3.5.4.11, bottom of page 3-98 states: "When suspected UXO is found in a training area, the explosive ordnance disposal team investigates it to identify the item and decide whether it can be removed or must be destroyed in place." Please discuss how many and what types of UXO have been identified outside of the currently active impact area to date. It is important to understand the degree to which UXO may be present across the state-owned property in areas not designated as impact areas.</p>	<p>As stated in Section 3.5.4.11, the types of military munitions that have been used on the State-owned land include small-caliber, large-caliber, pyrotechnics, obscurants, recoilless rifle projectiles, rifle grenades, rockets, mortars, and artillery.</p> <p>Text added to Section 3.5.4.11 to state, "Because the State-owned land is still an operational range, a full assessment of MEC that may be present has not been conducted."</p>
Sven Lindstrom	Hawai'i State, Department of Health, Hazard Evaluation and Emergency Response Office	<p>Section 3.5.4.11 on page 3-99 identifies three former ranges within the state-owned land and states "No land use restrictions have been imposed on any of these sites." Please explain why not. These areas are no longer active ranges and are not covered under the Military Munitions Rule, so they should be investigated and cleaned up under</p>	<p>Section 3.5.2 revised to add the definition of operational ranges.</p> <p>Text added to Section 3.5.4.11 to clarify that no land use restrictions have been imposed on the three former ranges because they remain in use for training activities</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>DERP/DSMOA/CERCLA. Until they are cleaned up, interim risk management controls would seem warranted. Also, this section references surface cleanup activities and sampling at some of these sites. Please provide all documentation of these investigations and cleanup activities to the HEER Office for our files. Finally, it was previously stated that the 1964 lease agreement only allowed for small arms use in the state owned land, therefore, please explain how these firing ranges were allowed to be located within the state lands.</p>	<p>by the Army and are considered operational ranges, even if live fire is not currently conducted. After training activities cease and the range is closed, the Army would address MEC through the Military Munitions Response Program, CERCLA, and the terms of the lease. Cleanup activities that occurred at the Former Bazooka Range were undertaken as part of active range management activities.</p> <p>As stated in Section 3.2.4.1, lease conditions stipulate that "Firing of live ammunition into any portion of the State-owned land is prohibited, except for artillery simulators, atomic bomb simulators and any similar devices, and explosives used in construction work, and a portion of Parcel A deemed by the U.S. Government to be safe for small arms firing." and "Rights conveyed to the U.S. Government include unrestricted control and use of the leased land...including the right to fire all combat weapons into the designated PTA impact area (on U.S. Government-owned land)."</p>
Stacy Ferreira	Hawai'i State, Office of Hawaiian Affairs	<p>CIA recommendationsIn OHA's previous 2022 comments, we called for an additional round of consultation and interviews given that CIA outreach occurred at the early onset of the COVID-19 pandemic. In the DLNR Land Division's comments to the Army, they expressed concern over the lack of mitigations within the CIA and mentioned that the only mitigation option for continued consultation was "grossly insufficient". In response to these calls, additional consultation has occurred and the CIA was revised. Indeed, OHA appreciates that the Army accepted these concerns and recommendations. We acknowledge that a revised CIA (dated January 2024) is included as Appendix I of the DEIS and includes at least 4 new responses to additional outreach notices published in December 2022. It is apparent to OHA that there is a foremost request for the creation of a cultural access plan in consultation with Native Hawaiians.</p>	<p>Section 3.4.6 identifies improving cultural access as a mitigation measure for adverse impacts to cultural practices.</p>
Ryan Kanaka'ole (Russell Y. Tsuji,	Hawai'i State, Department of	<p>After review of the document, the Land Division still has concerns regarding the information presented in the document as well as the conclusions drawn regarding</p>	<p>Because the Proposed Action is a real estate action (i.e. administrative action), some assumptions are necessary to provide analysis of impacts from retention of State-</p>

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
Administrator - Land Division)	Land and Natural Resources	impacts as many are still based on assumptions rather than technical data prepared for this specific action and thus finds this document does not meet the requirements of Hawai'i Revised Statutes (HRS) Chapter 343 and Hawai'i Administrative Rules (HAR) Chapter 11-200.1.	owned land. These assumptions are discussed in Section 2.3 and Appendix H.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	Pursuant to HAR §11-200.1-24(g)(6), the Draft EIS shall contain "summary technical data, diagrams, and other information necessary to enable an evaluation of potential environmental impact by commenting agencies and the public..." In addition, pursuant to HAR §11-200.1-24(i), "The draft EIS shall include a description of the environmental setting...Special emphasis shall be placed on environmental resources that are rare or unique to the region and the action site (including natural or human-made resources of historic, cultural, archaeological, or aesthetic significance)." In our original comment letter on the first Draft EIS, we stated that at minimum, any study, plan, or document referenced that was used to lay the basis of the existing environmental setting for the proposed action or as evidence to support appropriate management practices/mitigation measures currently in place should be included in the appendices. Rather than providing the requested documents, the Army has provided URL links "to the extent feasible" and has included them in Chapter 6, Reference List. However, we note that the majority of the available documents are State produced public documents that do not provide the earlier requested information and the documents that would actually be helpful to reference have no URL links. In addition, in the main document the Army appears to have provided what they consider to be summaries of the documents, which may or may not be missing valuable data to help the Department determine the impacts of the proposed action.	HAR §11-200.1-24(g)(6) states that a Draft EIS shall contain "summary technical data, diagrams, and other information necessary to enable an evaluation of potential environmental impact by commenting agencies and the public..." The Second Draft EIS provides such summaries, and including reference documents in the Appendices is not an explicit content requirement of HAR 11-200.1. Reference documents have been added to the USAG-HI PTA project website for public access to the extent feasible at <a href="https://home.army.mil/hawaii/application/files/7817/1350/6634/PTA_ATLR_Website_Supporting_Documents.pdf">https://home.army.mil/hawaii/application/files/7817/1350/6634/PTA_ATLR_Website_Supporting_Documents.pdf</a>
Stacy Ferreira	Hawai'i State, Office of Hawaiian Affairs	OHA does not see the original ECOP document or even a redacted version of the ECOP when searching the documents within the provided link. Further, its unclear if the DLNR was provided the ECOP as it appears to OHA that the information within it would be relevant to	Not all referenced documents are included as appendices. Links to the Phase I and II ECOPs and other referenced documents have been added to the PTA EIS website ( <a href="https://home.army.mil/hawaii/ptaeis/project-home">https://home.army.mil/hawaii/ptaeis/project-home</a> ) under the "Documents" tab.

**Responses to Second Draft EIS Comments**

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		<p>their condition assessment work as part of their court ordered management plan. OHA recommends that the ECOP (or a redacted version of the ECOP) be included as an Appendix to the DEIS, with relevant findings cited and discussed within appropriate DEIS sections. Further, the ECOP should be provided directly to the DLNR as well as OHA as part of the lease renewal process given our State duties to the public land trust.</p>	
<p>Stacy Ferreira</p>	<p>Hawai'i State, Office of Hawaiian Affairs</p>	<p>The DOH also appears to be adamant about ensuring that there is a requirement of any new lease to include “the identification and cleanup of all environmental hazards on State-owned land” and “ongoing investigation and cleanup of firing points.” In response, the Army states that in accordance with the existing lease and under the provisions of existing law, “the Army retains responsibility for cleanup and restoration of former training areas”. The DEIS was further revised to better explain these efforts in Section 3.5.4.11, which mentions the removal of solid waste, and deactivation or removal of all live and blank ammunition. OHA believes though that despite the DEIS being revised to include greater detail in regards to cleanup activities, this does not preclude the possibility of revisiting the existing lease conditions to make sure that language is reflective of all required cleanup actions under the law, DOH’s concerns, and any corrective actions that the DLNR may deem necessary. It would behoove the Army in their efforts to appeal to the State to make this clear in the DEIS and to ensure all State agency concerns are clearly understood with a table that identifies concerns and specific responsive actions taken (or those to be done in the future) by the Army. Any other discussions with the DOH on this matter to ensure their concerns are adequately met and understood should be summarized or detailed within the DEIS as well.</p>	<p>As noted in Section 1.5.2, State decisions following acceptance of the EIS may include the land retention estates and methods as well as associated terms (e.g., lease conditions) in any new real estate agreement. Sections 3.5.6.1, 3.5.6.2, and 3.5.6.3 state that for all State-owned land retained by lease that it is assumed that DLNR would continue to implement the COMP or develop and implement a revised lease compliance monitoring plan to confirm lease compliance, particularly with respect to military munitions and MEC.</p> <p>Section 3.5.4 provides information on range management activities the Army has conducted regarding hazardous substances and hazardous wastes within the State-owned land.</p> <p>Text in the Executive Summary, Chapter 2, and Appendix H has been revised as follows:</p> <ol style="list-style-type: none"> <li>1. Text noting that future lease conditions would be the same as the current lease changed to similar to the current lease.</li> <li>2. Text added to note future lease conditions may include references to state and federal regulations in existence at the time of a new lease. Note that adherence to future state and federal regulations under a new lease or easement is required regardless of any future lease conditions, and that the EIS cannot analyze potential impacts associated with future regulations because future regulations are unknown.</li> <li>3. Text added to note the State may revise or add lease conditions to a new lease based on the State's standard lease conditions in existence at the time of a new lease;</li> </ol>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
			<p>however, the EIS cannot analyze potential impacts associated with revised or new lease conditions because those future lease conditions are unknown.</p> <p>Appendix D lists all substantive agency and public comments and Army responses for the EIS.</p>
Stacy Ferreira	Hawai'i State, Office of Hawaiian Affairs	<p>OHA believes a shorter-term lease option could be more palatable to the State given that the public's general trust with the military's ability to properly steward Hawai'i lands and resources have been shaken in light of the recent failure of the Navy to properly inspect the Red Hill underground fuel tanks and past occurrences of strewn unexploded ordnances on State lands (i.e., Kaho'olawe, Makua Valley). A shorter-term lease option would allow the State to evaluate the progress of the lease and to see if conditions are being met. A short-term lease would also push the Army to more quickly restore 3,300 acres of State lands that would not be retained under the preferred alternative after decades of military use. Arguably, if such a shorter lease was granted to the Army in the past, it may have prevented past litigation that questioned the Army's care of PTA and the State's respective oversight as it would have forced the State to take a closer look at these lands. Any failure to comply with restoration efforts or even corrective actions required by the DLNR would allow the State to re-evaluate and renegotiate lease conditions more quickly with the Army. OHA believes the Army should not view a shorter-term lease option as punitive or some kind of mission hindrance; but rather, a better means for both the State and the Army to evaluate the lease and existing conditions for modes of improvement. A reasonable short-term lease for any leased State lands is a chance for the military to rebuild public trust and to demonstrate a level of compromise.</p>	<p>Your comment is acknowledged. As noted in Sections 1.3.3 and 2.2.5, federal directives such as 10 U.S.C. Section 2852 specify that in order to carry out military improvements or modernization efforts, a long-term interest in the land must be acquired. If a lease is pursued, any future lease terms would be negotiated between the State and Army during future lease negotiations.</p>
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	<p>There are also instances in the Second Draft EIS where a study is mentioned and the only information provided was the conclusion of the study, without the necessary background data to verify its applicability to this proposed action. Specifically, the Second Draft EIS</p>	<p>Additional wildlife and noise study information has been added to Sections 3.3.4.4, 3.3.6, 3.7.4, and 3.7.6.</p>

**Responses to Second Draft EIS Comments**

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		<p>notes that “multiple studies, including a monarch flycatcher study done on Schofield Barracks and Makua Military Reservation, have noted that birds and other wildlife have been documented as becoming habituated to aircraft overflights and other noise (e.g. artillery training) after continuous or frequent exposure.” However, neither the referenced study nor any relevant data was provided to ensure the Army’s claim that “most wildlife in the vicinity are expected to be habituated to noise associated with training activities” is accurate and that a study specific to the project area and its native wildlife is not warranted.</p>	
<p>Ryan Kanaka’ole (Russell Y. Tsuji, Administrator - Land Division)</p>	<p>Hawai’i State, Department of Land and Natural Resources</p>	<p>Most concerning is that the inventory of archeological sites still appears to be incomplete. While we acknowledge that Section 3.4, as well as the associated Archaeological Literature Review, has been updated to provide explanation on why some areas could not be surveyed (i.e. the areas that are inaccessible due to recent lava flows which create hazardous conditions), the reasoning provided as to why the other portions of the State leased lands have not been surveyed is unacceptable. Not utilizing an area for training or because it is part of a fenced area for protection of natural resources does not preclude the Army from doing proper due diligence especially as a new State land lease is being considered.</p>	<p>Section 3.4.4.6 discusses the Army's CRM Program at PTA, including the State-owned land. Previous archaeological surveys are provided in Table 3-11 of the EIS. Section 3.4.4.3 discusses why portions of State-owned land have not been surveyed.</p>
<p>Ryan Kanaka’ole (Russell Y. Tsuji, Administrator - Land Division)</p>	<p>Hawai’i State, Department of Land and Natural Resources</p>	<p>In addition, it is unclear from the document, what the ROI is for archeological resources. The Second Draft EIS itself, as well as numerous commentors acknowledge the presence of historic and cultural properties, including ‘iwi kupuna, within the impact zone. While the impact zone is located on Federally owned land, it should still be included as it is part of the “region” and therefore, surveyed. Furthermore, the Second Draft EIS has stated in the No Action Alternative scenario, the use of the impact zone would be reduced or not used at all. Therefore, it is important to understand the extent to which archaeological and cultural resources located within the impact zone will be impacted should a new State-land</p>	<p>EIS Section 3.4.3 explains that the ROI for historic and cultural resources (i.e. archaeological resources) is the State-owned land at PTA. EIS Section 1.4 provides the scope of the EIS, which includes a description of the Proposed Action, retention of State-owned land by the Army (an administrative action). The analysis of the Proposed Action therefore does not include historic and cultural resources on U.S. Government-owned lands at PTA such as the Impact Area.</p>

**Responses to Second Draft EIS Comments**

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Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	lease be pursued which would allow for the continuation of the Army's training at PTA.  While we understand that there is a 2018 Programmatic Agreement (PA) between the Army, the State Historic Preservation Division and the Advisory Council on Historic Preservation for adverse effects to historic and cultural resources that may result from ongoing routine military training actions and related activities at PTA, that agreement has not been provided for review so it is unclear what is covered by the PA and what is not.	The DLNR Chairperson was a signatory of the PA, and DLNR-SHPD should have an official copy of the document. The document is also publicly available and easily accessible via a Google search. The following link provides a PDF of the signed, publicly release document: <a href="https://home.army.mil/hawaii/application/files/3916/0210/3455/USAG-P_Hawaii_Island_Training_PA_Signed_27SEP18_PUBLIC_RELEASE_VERSION.pdf">https://home.army.mil/hawaii/application/files/3916/0210/3455/USAG-P_Hawaii_Island_Training_PA_Signed_27SEP18_PUBLIC_RELEASE_VERSION.pdf</a>
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	The Cultural Impact Assessment (CIA) also appears to be lacking consultation with people from the relevant moku, which in this case would be the moku of Waimea. This was confirmed through consultation with the Executive Director of the State Aha Moku. Through her review of the list of individuals and organizations contacted in Appendix A of the CIA, the Executive Director noted that there were several kūpuna from Waimea that are active practitioners at PTA that should have been included. In addition, the Executive Director herself holds knowledge of the area and would have been a valuable resource for the CIA. We note that we highly encouraged the Army to consult with the Aha Moku, and as of May 23, 2024, it would appear there has been little to no attempt on the Army's side to request consultation. In addition, one commentor on the first Draft EIS provided a copy of a Final Draft Report titled "Planning Level Oral History Survey of Traditional Cultural Properties on U.S. Army Pōhakuloa Training Area Hawai'i Island, Hawai'i." We note that valuable information is provided within the document and should have been included in the CIA for this project.	Section 2.2 of the CIA details the three public outreach methods used to identify potential individuals who have expertise and knowledge of cultural resources, practices, and beliefs relevant to the project area and broad geographical area. This included 1) a publication in the Office of Hawaiian Affairs Ka Wai Ola for three months; 2) social media posts on Facebook and Instagram, leading to an online survey completed by 236 individuals; 3) direct outreach to specific organizations and individuals, as shown in Appendix A of the CIA.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	As a side note, we also wish to point out that the historic/archeological and cultural resource studies done for the proposed action provide the basis for any State agency issuing a subsequent permit to conduct their Ka Pa'akai analysis which involves: 1. Identification and scope of "valued cultural, historical, or natural resources" in the project area, including the extent to which traditional and	Section 3.4 of the EIS, the appended CIA (Appendix I), and the ALR (Appendix J) provide information that the State can reference for the State to conduct a Kapa'akai Analysis pursuant to the State's obligation under Article 12, Section 7 of the Hawaii Constitution to protect Native Hawaiian Traditional and Customary Native Hawaiian Rights.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>customary native Hawaiian rights are exercised in the area; 2. The extent to which those resources, including traditional and customary native Hawaiian rights, will be affected or impacted by the proposed action; and 3. The feasible action, if any, to be taken to reasonably protect native Hawaiian rights if they are found to exist. Currently, there would be insufficient information for any State agency to do a thorough Ka Pa'akai analysis.</p>	
<p>Ryan Kanaka'ole(Russel I Y. Tsuji, Administrator - Land Division)</p>	<p>Hawai'i State, Department of Land and Natural Resources</p>	<p>Pursuant to HAR §11-200.1-24(p), "The draft EIS shall consider mitigation measures proposed to avoid, minimize, rectify, or reduce impacts, including provision for compensation for losses of cultural, community, historical, archaeological, and fish and wildlife resources, including the acquisition of land, waters, and interests therein. Description of any mitigation measures included in the action plan to reduce significant, unavoidable, adverse impacts to insignificant levels, and the basis for considering these levels acceptable shall be included. Where a particular mitigation has been chosen from among several alternatives, the measures shall be discussed and the reasons given for the choice made. The draft EIS shall include, where possible, specific reference to the timing of each step proposed to be taken in any mitigation process, what performance bonds, if any, may be posted, and what other provisions are proposed to ensure that the mitigation measures will in fact be taken in the event the action is implemented." While we appreciate the inclusion of best management practices (BMPs), standard operating procedures (SOPs), and management activities, we note that more information regarding the specificities of such needs to be included and elaborated upon. Often, it is unclear whether assessments have been completed or are in the process of being completed. It is also unclear what the time frame is for most of the monitoring activities that are mentioned. There are also measures that call for studies to be conducted but it is unclear if those studies were ever completed and if so, where are the data from those studies. There are also very generic statement such</p>	<p>The phasing, timing, and description of mitigation measures to address significant adverse impacts are included in the Final EIS, and will be committed to in the Record of Decision. Where applicable and to the extent feasible, discussions of BMPs and SOPs have been revised to include more detail.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	<p>as "digging fighting positions follow specific rules" but those specific rules are never discussed.</p> <p>We also note that there are instances in which there may be appropriate mitigation, yet the document has not articulated it well or has overlooked potential mitigation measures. For example, in Section 3.2.6, it states that there would be "continued long-term, significant, adverse impacts on land tenure" as the land would be temporarily removed from use as a part of the public trust. It would seem that a potential mitigation measure would be for the Army to offer fair and just compensation through any potential lease negotiations with the Board of Land and Natural Resources (Board).</p>	<p>The beginning of this paragraph discusses potential lease with, "There would be new, long-term, moderate, beneficial impacts on land tenure from a new lease negotiated at equitable, fair market value that would generate annual revenue throughout the existence of the new lease that would be used for State programs to benefit Native Hawaiians and the public in accordance with Admission Act Section 5(f) and HRS 171-18, Public Land Trust." A new lease negotiated at an equitable, fair market value is not proposed mitigation.</p>
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	<p>In the same broader section, under the no action alternative, it states that "there would be new long-term, moderate, adverse impacts on encroachment management from the loss of Army control over lands adjacent to U.S. Government-owned land, creating potential safety and security concerns if the public inadvertently enters U.S. Government-owned land." There is no potential mitigation proposed, however, it would seem that installing fencing and posting signs on U.S. Government land would be practical and prudent for this alternative.</p>	<p>The No Action Alternative does not include proposed Army actions so no mitigation is proposed (i.e., there are no Proposed Action impacts to mitigate); however, the Army would implement lease compliance actions and cleanup and restoration activities.</p>
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	<p>In our previous comments, we also stated that studies over 10 years old should be reviewed and updated. A current comprehensive biological survey for the region of influence (ROI) would give the Department a clear indication of the resources in the area and the impacts that continued training would have on those resources. For example, the terrestrial arthropod study was done over 26 years ago. Species may no longer be present at PTA due to changes in habitat or new species may even be present, but none of this information can be ascertained as no current survey has been done. It should be noted that similar studies for other projects have indicated changes to habitat conditions in as little as 10 years.</p>	<p>Section 3.3.4 has been updated with more recent scientific data and surveys. Mitigation measures the Army would consider include: (1) a multi-year research project to identify possible biological controls in the native range of <i>C. setaceus</i> (fountain grass); (2) installation invertebrate surveys; (3) an ungulate impact assessment; (4) negotiation of an agreement with the State to monitor wildfires on land not retained; and (5) implementation of additional thermal technology. These mitigation measures have been added to the Mitigation Measures subsection.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
<p>Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)</p>	<p>Hawai'i State, Department of Land and Natural Resources</p>	<p>In addition, a current survey would fill in the data gaps that are currently present throughout Section 3.3. In our comment letter on the first Draft EIS, we requested more information on Band-rumped storm petrel. However, the only additional information provided in the Second Draft EIS was that "in 2020 the Army initiated informal consultation with USFWS for small mammal predator control during breeding season at a band-rumped storm petrel colony." There is no discussion of the general location of the colony nor its size, or the potential for other colonies to be located within the ROI.</p>	<p>Appendix K provides the background for how this species uses PTA and the activities that Natural Resources staff conduct to monitor band-rumped storm-petrels.</p> <p>PTA staff monitor for Hawaiian petrel and band-rumped storm-petrel presence and habitat use. Between September 2022 and September 2023 PTA Natural Resources staff used specially trained detector dogs to conduct 10 burrow surveys covering over 23 miles. Additionally PTA natural resources staff assisted the Department of Natural Resources-Division of Forestry and Wildlife staff to survey for Hawaiian Petrel and Band-rump Storm Petrel at Mauna Loa. Additional information has been added to Appendix K.</p> <p>To protect locations, the Army does not provide figures with locations of burrows, but all the band-rumped storm-petrel burrows and activity documented by PTA Natural Resources staff has occurred in the southeastern portion of PTA. No burrows or activity has been documented on State-owned land. In 2016, it was determined that Hawaiian petrels do not use habitat at PTA; they have only been observed flying over the installation. There have been no documented activities for the Hawaiian petrel on State-owned land.</p>
<p>Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)</p>	<p>Hawai'i State, Department of Land and Natural Resources</p>	<p>It was also disclosed in the Second Draft EIS that the Hawaiian petrel was observed at PTA. However, it is unclear if they use PTA as a breeding site or if it is part of a fly over path. We note that we later found some of this information within the response to the DOFAW comment letter and in Appendix K, however, there is no confirmation whether or not colonies exist on the State-owned land as there are no surveys to reference. Further, it appears training activities may affect the colonies. In addition, as the colony is located in the southeastern portion, it may also be affected by the No Action Alternative since access to the southern portions of Federally owned lands may be significantly reduced. However, none of this has been addressed in the Second Draft EIS.</p>	<p>In compliance with the 2003 Biological Opinion PTA staff monitor for Hawaiian petrel and band-rumped storm-petrel presence and habitat use. Between September 2022 and September 2023 PTA Natural Resources staff used specially trained detector dogs to conduct 10 burrow surveys covering over 23 miles. Additionally, PTA natural resources staff assisted the Department of Natural Resources-Division of Forestry and Wildlife staff to survey for Hawaiian Petrel and Band-rump Storm Petrel at Mouna Loa. Additional information has been added to Appendix K.</p> <p>In 2016, it was determined that Hawaiian petrels do not use habitat at PTA; they fly over the installation and PTA continues to record Hawaiian petrel detections at the</p>

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
			installation. There have been no documented activities for the Hawaiian petrel on State-owned land.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	We note that Table ES-3 is hard to understand. We would suggest using the "Harvey Balls" style used by Consumer Reports as a clearer and more familiar expression of qualitative information.	Please see General Response 1.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	There also other data gaps within Chapter 3 of the Second Draft EIS. One data gap that should be addressed is ground water sampling. The Army finds that the proposed action would have no impact to the ground water resources in the area based on lack of rainwater and surface water in the area. However, there is no technical water quality data to confirm whether there are any impacts to the underlying aquifer. Given that PTA consists mostly of porous lava rock and the fact that ground water is both a highly protected natural and cultural resource, ground water sampling should be conducted to ensure this valuable resource is protected.. Further it appears that runoff events do occur at the site. Page 3-101 includes a statement that alludes to this fact and thus is contradictory to the conclusions that the Army draws regarding potential impacts to water resources. Moreso, it would appear that the Army is capable of conducting such testing as it is mentioned in section 3.9.4.1 that the PTA-2 borehole was surface completed for potential future use as a monitoring well.	Section 3.9.4.2 has been updated to include additional information from the Thomas (2019) report. A link to this report has been added to the PTA EIS website ( <a href="https://home.army.mil/hawaii/ptaeis/project-home">https://home.army.mil/hawaii/ptaeis/project-home</a> ) under the "Documents" tab.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	In addition, there appears to be data gaps regarding military munitions and munitions and explosives of concern (MECs). The Second Draft EIS notes on page 3-99 that "Soil sampling has not been performed on all the TAs, FPs, and ranges to determine the presence or absence of MCs." It is unclear how the Army can conclude that there would be "continued long-term minor, adverse impacts" on the environment associated with military munitions and MECs.	Section 3.5.4.11 revised to note that soil sampling to determine the presence or absence of munitions constituents has not been performed at all training areas, firing points, and ranges on the State-owned land due to the impracticality of sampling every such location on an approximately 23,000-acre area.  Sections 3.5.4.11 and 3.5.4.12 describe the lack of mobilization of munitions constituents within soil, groundwater, and surface water.  Section 3.5.2 revised to add the definition of operational ranges.

Responses to Second Draft EIS Comments

Commenter	Submitted By	Comment	Response
			<p>Section 2.1 states that after expiration of the current lease, the Army would follow federal law and regulations to determine how and when cleanup and restoration activities for hazardous substances and MEC within the State-owned land not retained would occur under the CERCLA process.</p> <p>Section 3.5.6 revised to clarify that following completion of lease compliance actions and cleanup and restoration activities, the Army would remain responsible for disposing of any MEC that is incidentally found on the State-owned land not retained due to the DoD's live-fire military training at PTA.</p>
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	The EIS should note that the first Draft EIS did not meet the requirements of HRS Chapter 343 and HAR Chapter 11-200.1 as a reason for the need to publish a Second Draft EIS.	Section 1.6.4 provides a discussion on why a Second Draft EIS was published. Appendix D includes responses commensurate to all agency and public comments on the Draft EIS.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	We also reviewed the comments on the first Draft EIS and believe that some of the responses did not necessarily address agency, organization, and individual's concerns. Further, information that would have been valuable in the main document can be found in the responses, but given the voluminous size of the Second Draft EIS, it is cumbersome to identify.	NEPA and HEPA require responses to substantive comments. Section 1.6.2 notes that, in determining whether a comment is substantive, the EIS preparer "... shall consider the validity, significance and relevance of the comment to the scope, analysis or process of the EIS (HAR Section 11-200.2-26[a])." For this EIS, comments that help refine the Proposed Action or alternatives; identify specific resource analysis to be conducted in the EIS (e.g., cultural resources, biological resources, hazardous waste); and/or recommend technical data, specific impacts or mitigation measures were considered substantive. Statements considered to not be substantive were general comments with no specific information, such as those that stated preferences for or against the Proposed Action, military, or Army in Hawai'i.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	Also, regarding mitigation for impacts to the Hawaiian hoary bat, the Second EIS notes that as best management practice (BMP), barbed wire security fences are inspected quarterly for entangled bats. It would appear that a potential, simple, mitigation measure to reduce impacts would be to consider removing barbed wire from fencing.	<p>In compliance with the 2008 BO, barbed wire inspections are conducted quarterly by the PTA Natural Resources staff. Only a single bat has been found impaled on a fence since 2008. Barbed wired is used judiciously and only when necessary for security purposes.</p> <p>Clarifying text was added to Section 3.3.4.4.</p>

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	Regarding the mitigation measures proposed for impacts to cultural resources, consultation with Native Hawaiians and cultural practitioners should be an actively ongoing management practice and to formalize a cultural access request process does not provide any guarantee that the process would not further frustrate access. Furthermore, "explor[ing] options" to provide unlimited cultural access to specific locations does not require the Army to commit to anything. Moreover, the mitigation proposed does not offer any "timing" nor "provisions...to ensure" that the mitigation measures will be implemented should the project move forward.	Section 3.4.4.6 has been revised to clarify that outreach and engagement with cultural practitioners and NHOs is an ongoing, existing management measure. Mitigation measures for significant, adverse impacts on cultural practices are identified in EIS Sections 3.4.6.1, 3.4.6.2, and 3.4.6.3.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	Regarding the documents listed in Table ES-1, there should be some type of access to the NEPA documents regarding the training and infrastructure within the State-owned lands at PTA. Searching the documents via the web did not produce access to any copies of the documents.	Link to documents have been added to Chapter 6 of the EIS as well as the PTA EIS website ( <a href="https://home.army.mil/hawaii/ptaeis/project-home">https://home.army.mil/hawaii/ptaeis/project-home</a> ) under the "Documents" tab.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	Table ES-2, column one, should be revised as currently what is listed is regulatory citations rather than the permit or approval itself. For example, for the Conservation District, the permit/approval should be a Conservation District Rule Amendment.	Because the Proposed Action is an administrative action (a real estate action) the reviews and approvals are limited. Table ES-2 and Table 1-1 provide compliance with HAR §11-200.1-24(k). The table is named to demonstrate that all potential permits, licenses, and approvals necessary for implementation of the Proposed Action were considered.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	Regarding mitigation measures for military munitions and MECs, we would request that the Army clean up the Former Bazooka Range, Former Tank Gunnery Range, Potential Former Burn Pan, and any other areas not currently in use, as well as any scattered shell casings as noted in inspection reports.	Section 3.5.6 describes the cleanup activities to be performed on any State-owned land not retained, including potentially the three ranges referenced by this comment.  Section 3.5.2 revised to add the definition of operational ranges.  Text added to Section 3.5.4.11 to clarify that the three former ranges remain in use for training activities by the Army and are considered operational ranges, even if live fire is not currently conducted. After training activities cease and the range is closed, the Army would address MEC through the Military Munitions Response Program, CERCLA, and the terms of the lease. Cleanup activities that occurred at the Former Bazooka Range were

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
			undertaken as part of active range management activities.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	Pursuant to HAR §11-200.1-24(n), "The draft EIS shall include in a separate and distinct section a description of all irreversible and irretrievable commitments of resources that would be involved in the proposed action should it be implemented." As noted in the Second Draft EIS, the Army appears to take the position that this section is generally limited to only energy or other non-renewable resources. We disagree with that position as it is our understanding that this section applies to ALL resources (natural and cultural) and thus this section should be revised to encapsulate all irreversible and irretrievable commitments of resources as a result of the proposed action.	Section 5.5 has been revised to note that beyond potential impacts to cultural resources, there are no anticipated irreversible and irretrievable commitments of resources beyond the impacts analyzed and discussed in Chapter 3.
Kali Watson	Hawai'i State, Department of Hawaiian Home Lands	DHHL appreciates that the SDEIS clearly shows that TMKs (3) 3-8-001 :013 & (3) 3-8-001 :022 (approx. 250 acres) are a part of the Hawaiian Home Lands. DHHL also appreciates that the SDEIS mentions that for all proposed alternatives the approximately 250 acres of DHHL-administered land will not be included in the proposed lands retained for the PTA. As such, the applicant should prepare a plan based on direct consultation with DHHL for the de-occupation and return of these lands to DHHL so they may be utilized in the implementation of the Hawaiian Homes Commission Act and for the benefit of native Hawaiians.	The Army's lease is with the Division of Land and Natural Resources, so lease compliance actions for land not retained would be coordinated with them. Whether and how the Division of Land and Natural Resources coordinates with the Department of Hawaiian Home Lands regarding implementation of the lease compliance actions is outside the scope of the EIS. The Army would also conduct advanced coordination with the Department of Hawaiian Home Lands.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	In Section ES.11, it should be noted that the statement regarding the Army selecting potential mitigation measures and mitigation monitoring plans in the Record of Decision (ROD) does not supersede any discretionary decisions made by the Board of Land and Natural Resources (Board) who may require mitigation measures and monitoring plans that are not identified in the ROD should the State Land lease option be pursued.	The phasing, timing, and description of mitigation measures to address significant adverse impacts are included in the Final EIS, and will be committed to in the Record of Decision; however, should a lease option be pursued, discretionary decisions made by the Board of Land and Natural Resources may identify additional measures.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	Pursuant to HAR §11-200.1-24(o), "The draft EIS shall address all probable adverse environmental effects that cannot be avoided...Also the rationale for proceeding with a proposed action, notwithstanding unavoidable effects, shall be clearly set forth in this section. The draft EIS shall indicate what other interests and considerations	Text in Section 5.6 that discusses the rationale for proceeding with the Proposed Action has been moved to Section 5.4, Unavoidable Significant Adverse Impacts.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>of governmental policies are thought to offset the adverse environmental effects of the proposed action. The draft EIS shall also indicate the extent to which these stated countervailing benefits could be realized by following reasonable alternatives to the proposed action that would avoid some or all of the adverse environmental effects." While the Second Draft EIS does include a section discussing unavoidable significant adverse impacts, it does not include the rationale for proceeding with the proposed action nor the other interests and considerations of governmental policies.</p>	
<p>Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)</p>	<p>Hawai'i State, Department of Land and Natural Resources</p>	<p>Expanding the Table of contents consistently to 4 or 5 places (to the extent appropriate) would assist a reader in assessing the overall format and analytical framework. Four places is inconsistently used. For example, Section 3.1.3.1 does not appear in the table of contents. Furthermore, Section 3.1.4 Analysis Methodology contains 12 discussion points that could have potentially been assigned subsection numbers. Similarly, Section 3.2.4.1 Land Tenure, has 6 discussion points that could have been assigned subsection numbers. The aforesaid are cited as examples and not intended as definitive or comprehensive.</p>	<p>Headings have been revised where applicable to consistently show 4 heading levels (i.e. 1.2.3.4). The EIS and TOC will not include subheadings beyond 4 levels.</p>
<p>Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)</p>	<p>Hawai'i State, Department of Land and Natural Resources</p>	<p>Asbestos containing material (ACM) and aqueous film forming foam (AFFF) are not listed in this section. A further review of the document may be warranted to check if there are other omissions.</p>	<p>The Acronyms and Abbreviations list has been revised to include ACM and AFFF.</p>
<p>Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)</p>	<p>Hawai'i State, Department of Land and Natural Resources</p>	<p>Also, for the HRS Chapter 6E Hawaii Historic Preservation Review, the correct reference should be HRS §6E-42 and HAR Chapter 13-284 as this would be considered an applicant action.</p>	<p>The text has been updated per comment recommendation.</p>
<p>Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)</p>	<p>Hawai'i State, Department of Land and Natural Resources</p>	<p>Please also include the permits that are listed in Section 3.3.6.1 which are not included in Table ES-2. Note that these comments also apply to Table 1-1.</p>	<p>Tables ES-2 and 1-1 have been revised to include the permits noted in Section 3.3.6.1.</p>
<p>Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)</p>	<p>Hawai'i State, Department of Land and Natural Resources</p>	<p>Section 1.3.3 makes a statement that "loss of the State-owned land would result in substantial impacts on training because the Army would no longer have access to these critical maneuver areas, facilities, utilities, and infrastructure. Several of the training features and</p>	<p>Section 1.3.3 notes that "no other training area in Hawai'i can accommodate collective training at larger than company size" in addition to further information on the Army's need to retain State-owned land at PTA. Section</p>

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
		capabilities within the State-owned land are not available elsewhere within PTA or Hawai'i." It is unclear whether the loss of the training facilities and capabilities could be compensated for at other training facilities.	1.2.2 provides a discussion on the strategic importance of Hawai'i for national defense.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	This section [Section 1.3.3] also states that "with fewer than five years remaining on the lease of State-owned land, these directives limit the Army's ability to invest in improvements at PTA." This is contradictory to Table 4-1 which identified short range projects (0-7 years) as a part of the PTA Real Property Master Plan. While the project would occur on the Federally owned land, some of the proposed project may have impacts to State resources such as ground water and thus, should be discussed within this document.	The short-range projects at PTA referenced by this comment and listed in the Real Property Master Plan (RPMP) are located on U.S. Government land, thereby providing the Army a "long-term interest" in the land. Future modernization projects would require future NEPA and HEPA analysis. Analysis of the projects on U.S. Government land listed in Table 4-1 is outside the scope of this EIS.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	Section 1.4.2 should include the permits that the Army hold in order to comply with HRS Chapter 195D.	Section 1.4.2 includes the statement "Under the rules, the Army holds permits that authorize collection of threatened and endangered plants for scientific purposes, possession of salvaged bird carcasses from PTA, and off-site mitigation with threatened or endangered plants."
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	In Section 1.6, DLNR would appreciate an expanded discussion regarding the Army's efforts for public engagement for the proposed action outside of the required consultation determined by the HEPA and NEPA processes.	Section 1.6 and Chapter 8 provide a discussion of the Army's efforts for public engagement for the Proposed Action beyond NEPA and HEPA requirements, including a 60-day comment period for the Draft EIS, two public, livestreamed meetings for both the Draft and Second Draft EIS, and direct mail postcards to stakeholders.  Table 3-31 provides a table of major engagement activities and ongoing community outreach efforts outside of the Proposed Action that are intended to foster community support and mutually respectful dialogue.
Sven Lindstrom	Hawai'i State, Department of Health, Hazard Evaluation and Emergency Response Office	Section 2.1 on page 2-2 states "Lease compliance actions for a new lease or easement are unknown but are assumed to be similar to the current lease (see Section 2.3 for additional details) and may be subject to future negotiation." Why would you make this assumption given that most current state and federal environmental regulations did not exist at the time that the first lease agreement was drafted? Any new lease agreement should	Future lease conditions text in Sections ES.12, 2.1, 2.3, 3.1.3.1, and 5.2 and Appendix H revised as follows: 1. Text noting that future lease conditions would be the same as the current lease changed to similar to the current lease. 2. Text added to note future lease conditions may include references to state and federal regulations in existence at the time of a new lease or easement. (Note that

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
		address management of potential contamination of the property and requirements to cleanup areas already contaminated.	adherence to future state and federal regulations under a new lease or easement is required regardless of any future lease conditions, and that the EIS cannot precisely analyze potential impacts associated with future regulations because future regulations are unknown.) 3. Text added to note the State may revise or add lease conditions to a new lease based on the State's standard lease conditions in existence at the time of a new lease; however, the EIS cannot precisely analyze potential impacts associated with revised or new lease conditions because those future lease conditions are unknown.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	If Section 1.1.2 is supposed to address the history of the State-Owned land at PTA, it is confusing as to why Section 3.4 provides the historical overview. This is confusing to the reader.	Section 1.1.2 has been revised to note that a discussion of the cultural history of the State-owned land at PTA can be found in Section 3.4.4.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	Section 1.1.3 includes a statement that the retention of the State-owned lands was determined as the preferred alternative due to "low environmental impact." It is unclear how this statement can be made given that ES. 9 and ES. 10 have stated that there are adverse significant impacts to land use, biological resources, historic and cultural resources and cultural practices, and environmental justice.	Section 1.1.3 has been revised to make clear that the "low environmental impact" is in reference to the Analysis of Alternatives Study (USACE-POH, 2017). More context has been provided.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	Page 1-9, second paragraph from the bottom, the first sentence seems to be contradictory. On one hand it states that there are "numerous" Local Training Areas (LTAs) within the State, but in the same sentence, it appears they are limited to only O'ahu and Hawai'i islands. Please clarify the statement.	Section 1.2.3 has been revised for clarity.
Stacy Ferreira	Hawai'i State, Office of Hawaiian Affairs	While OHA does acknowledge that a 10-year lease term could indeed be problematic for the military, it's unclear why other more meaningful options (i.e., 35 or 40 year lease) haven't been seriously considered. By the Army's provided rationale, any acceptable short term lease option could include anything between 25 to 64 years. OHA requests that the Army include a reasonable shorter-term lease alternative (i.e., 35 or 40 or 45 years) that would not be so easily dismissed and would be afforded a full detailed environmental analysis. If there is a reason to	Text added to Sections ES.6, ES.12, 2.1, and 5.2 to clarify that the Proposed Action does not include a defined land retention duration because that would be negotiated with the State following completion of the EIS.

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
		dismiss 35 or 45 year lease options, than this must be fully explained in the DEIS.	
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	In Section ES.6, please clarify the term of the lease that the Army would be requesting should the Army pursue the path of a State lease.	Text added to Sections ES.6, ES.12, 2.1, and 5.2 to clarify that the Proposed Action does not include a defined land retention duration because that would be negotiated with the State following completion of the EIS.  Section 2.2.5 states that the Army must have at least a 25-year lease to permit construction in the future, which aligns with Proposed Action screening criteria 1 in Section 2.1.4. Similar text added to Sections ES.12 and 5.2. Note that future construction is not part of the Proposed Action, not currently planned, and would require separate future NEPA and HEPA analysis, as applicable.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	ES.12 – 4th paragraph as well as Section 2.1, page 2-2 last paragraph, includes a statement regarding lease compliant actions that “are assumed to be the same as the current lease.” This is an incorrect assumption. Standard conditions for leases, in general, have evolved over the years, and considering that the original lease was issued in 1964, it should be expected that lease conditions would be different and expanded.	Future lease conditions text in Sections ES.12, 2.1, 2.3, 3.1.3.1, and 5.2 and Appendix H revised as follows: 1. Text noting that future lease conditions would be the same as the current lease changed to similar to the current lease. 2. Text added to note future lease conditions may include references to state and federal regulations in existence at the time of a new lease or easement. (Note that adherence to future state and federal regulations under a new lease or easement is required regardless of any future lease conditions, and that the EIS cannot precisely analyze potential impacts associated with future regulations because future regulations are unknown.) 3. Text added to note the State may revise or add lease conditions to a new lease based on the State's standard lease conditions in existence at the time of a new lease; however, the EIS cannot precisely analyze potential impacts associated with revised or new lease conditions because those future lease conditions are unknown.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	ES.12 – 4th paragraph as well as Section 2.1, page 2-2 last paragraph, includes a statement regarding lease compliant actions that “are assumed to be the same as the current lease.” This is an incorrect assumption. Standard conditions for leases, in general, have evolved over the years, and considering that the original lease was issued in 1964, it should be expected that lease conditions would be	Future lease conditions text in Sections ES.12, 2.1, 2.3, 3.1.3.1, and 5.2 and Appendix H revised as follows: 1. Text noting that future lease conditions would be the same as the current lease changed to similar to the current lease. 2. Text added to note future lease conditions may include references to state and federal regulations in existence at

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
		different and expanded. This comment also applies to Section 2.1 as the same statement was made.	the time of a new lease or easement. (Note that adherence to future state and federal regulations under a new lease or easement is required regardless of any future lease conditions, and that the EIS cannot precisely analyze potential impacts associated with future regulations because future regulations are unknown.) 3. Text added to note the State may revise or add lease conditions to a new lease based on the State's standard lease conditions in existence at the time of a new lease; however, the EIS cannot precisely analyze potential impacts associated with revised or new lease conditions because those future lease conditions are unknown.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	In Section 2.1, the last sentence on page 2-1, only refers to potential NEPA compliance. It should also reference to HEPA compliance as well, especially if such "changes" would occur on the State-owned lands.	Text in Sections ES.6 and 2.1 revised to include HEPA analysis, as applicable.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	At the end of page 2-2, the document states that "...after expiration of the current lease, and if deemed necessary, the Army would follow Army regulations to determine how and when cleanup and restoration activities for hazardous substances and hazardous wastes, including munitions and explosives of concern (MEC)...would occur..." We ask that you provide more details regarding what this process would look like.	Sections 2.1 and 3.5.2 revised to state that the Army would follow the CERCLA process in accordance with applicable DoD and Army regulations and processes. The CERCLA process includes phases including preliminary assessment/site inspection, remedial investigation/feasibility study, remedial design/remedial action, and post-construction completion phases. The Army will coordinate its cleanup actions with the State of Hawai'i throughout the CERCLA process.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	Chapter 3 in general is a bit convoluted as the BMPs, SOPs, and other management activities are discussed before the existing conditions at the project site are even established. It would have been more helpful to know the existing conditions upfront and then understand how the management activities tie into the preservation of the resources.	Each resource section in Chapter 3 is organized to discuss existing conditions followed by existing management measures.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	On page 2-3, there is a statement made which reads "Future cleanup and restoration activities would be completed in accordance with applicable future requirements, which are not known and may include emerging contaminants that become known in the future." Please revise the language or clarify what you are alluding to.	Text in Sections ES.12, 2.1, 3.5.6, and 5.2.4 revised to state that the cleanup and restoration activities for State-owned land not retained would be triggered by and conducted after expiration of the current lease and, therefore, are not part of the Proposed Action. These activities would be completed in accordance with applicable future cleanup and restoration requirements and standard processes (i.e., requirements and standard

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
			processes at the time the activities are initiated). These future cleanup and restoration requirements, standard processes, and associated costs are unknown.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	In Section 2.1.2, under the discussion of maneuver areas, we ask that you include further details regarding the digging and excavating activities that occur (e.g. how large are the areas, how deep, etc.).	Text added to Section 2.1.3 regarding the limits for digging and excavating in USAG-PTA External Standard Operating Procedures (2018) and PTA Range Operations Standing Operating Procedures (2022).
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	Section 2.1.3 references a Pōhalaukuloa Training Area Range Operations Standard Operating Procedures document. Please include the document in the EIS.	The Pohakuloa Training Area Range Operations Standard Operating Procedures (2022) is not currently publicly available due to operational security requirements. The Freedom of Information Act (FOIA) Library and FOIA Request process are available at: <a href="https://www.rmda.army.mil/foia/RMDA-FOIA-Division.html">https://www.rmda.army.mil/foia/RMDA-FOIA-Division.html</a> .
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	Regarding potential mitigation measures, it is unclear why installation of wire fencing and signage on State-owned land retained is even being proposed. There is nothing in the existing conditions section that alludes to any accidental trespassing issues that would trigger such a response. This comment applies to Alternatives 2 and 3 as well.	Section 3.2.4.3 discusses actions the Army takes to manage encroachment beyond accidental trespassers. With the return of portions of the State-owned land, those actions would not be sufficient to continue to manage encroachment so additional physical barriers would be necessary to ensure individuals are aware of where State-owned land boundaries are located.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	Section 3.3.4.1 refers to an existing Biological Opinion (BO), however, it is unclear what is covered in this BO and this BO should have been added to the appendices for reference purposes.	Links to the 2003, 2008, and 2013 BOs have been added to Chapter 6 of the EIS as well as the PTA EIS website ( <a href="https://home.army.mil/hawaii/ptaeis/project-home">https://home.army.mil/hawaii/ptaeis/project-home</a> ) under the "Documents" tab.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	There is also a reference to a 2003 and 2008 BO which included incidental take statements for the Hawaiian hoary bat and the Hawaiian goose. Please include those documents to appendices and include the take limits for these two species in your discussion.	Links to the 2003, 2008, and 2013 BOs have been added to Chapter 6 of the EIS as well as the PTA EIS website ( <a href="https://home.army.mil/hawaii/ptaeis/project-home">https://home.army.mil/hawaii/ptaeis/project-home</a> ) under the "Documents" tab.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	The document states that the 2013 BO determined that military activities did not affect the Hawaiian hawk and that subsequently the Hawaiian hawk was removed from the Federal List of Endangered and Threatened Wildlife in 2020. Please include a discussion on how the U.S. Fish and Wildlife Service came to the conclusion of no impacts to the Hawaiian hawk. Also, it should be noted that the Hawaiian hawk is still listed as being an endangered species at the State level.	The Army provided a letter to USFWS on 7 Nov 2012 requesting a not likely to adversely affect determination for the Hawaiian Hawk due to programmatic military training at PTA and KMA. Following an in-person meeting with USFWS, the Army amended the effect determination to no effect, USFWS recommended a no effect determination as the most expeditious way to address the Hawaiian hawk at PTA.  The Army is aware that the Hawaiian hawk is listed as

Responses to Second Draft EIS Comments

Commenter	Submitted By	Comment	Response
			endangered by the State and implements monitoring and records incidental sightings under the Integrated Natural Resources Plan and in accordance with the Migratory Bird Treaty Act.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	Please include the referenced Pacific Island Fish and Wildlife Office federally listed plant and wildlife species list.	A link to the Pacific Island Fish and Wildlife Office federally listed plant and wildlife species list has been added to the PTA EIS website ( <a href="https://home.army.mil/hawaii/ptaeis/project-home">https://home.army.mil/hawaii/ptaeis/project-home</a> ) under the "Documents" tab.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	In Section 3.2.4.5, please elaborate further on the rules for "digging fighting positions."	Section 3.2.4.5 has been revised to elaborate on digging survivability positions.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	The BMPs, SOPs, and management measures for Wildlife Friendly Lighting and Dark Skies does not seem appropriate in this Section as the broader Section 3.2 discusses the topic of Land Use.	Section 3.2.4.5 has been revised to remove "Wildlife Friendly Lighting and Dark Skies"; it is included in the existing management measures of Section 3.3, Biological Resources.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	Section 3.2.6.1, the document states that the significant impacts associated with the Conservation District could be "reduced to less than significant through the State's approval of a petition for a special subzone in the conservation district that would allow military training." We note that it would be a rule amendment, not just a "petition." Further, approval by the Board as mentioned in this document is purely speculative and therefore may not prove to be a viable solution in the event the Board denies such as rule amendment.	Sections 1.4.2, 3.2, and 5.3.2 have been revised to clarify the process would be a rule amendment. Sections 1.4.2, 3.2, and 5.3.2 have also been revised to make clear that for analysis purposes, the EIS assumes BLNR would establish a special subzone in the conservation district that allows for military training use.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	Under the heading regarding Land Not Retained, it states that "State control of this land would provide a new opportunity to use the land and any proceeds for the explicit purposes of HRS 171-38." Specifically, the lands would return to the State under the jurisdiction of the Department of Hawaiian Homelands Lands (DHHL). DHHLs mission is to administer public lands for homesteads. It is unclear the effort it would take to clean up the lands being returned and the true usability of the land to fulfill DHHL's mission is unknown. In addition, majority of the land is designated as critical habitat for the palila which would further add to the hurdles that DHHL would need to work through before being able to plan for uses on the	Additional information has been added to Section 3.2.6 to clarify the beneficial impacts on land not retained.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		land. This comment also applies to the other alternatives and their analysis. While the lands not retained would return the public trust, again the cleanup efforts, unknown lease compliance conditions, etc. make it hard to determine if there is a beneficial impact other than that the lands return to the public trust where they may sit unused for decades.	
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	There is mention of a band-rumped storm petrel colony however there is no discussion of the general location of this colony in relation to the State-owned lands nor if there are any other colonies throughout PTA. Please include this information.	To protect locations, the Army does not provide figures with locations of burrows, but all the band-rumped storm-petrel burrows and activity documented by PTA Natural Resources staff has occurred in the southeastern portion of PTA. No burrows or activity has been documented on State-owned land at PTA. Additional information has been added to Appendix K.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	Please confirm the status of the conservation measures listed in Table 3-1 and include any completed studies/surveys.	Table 3-1 has been updated per comment recommendation.  Applicable studies are referenced and links are provided in Chapter 6 of the EIS as well as the PTA EIS website ( <a href="https://home.army.mil/hawaii/ptaeis/project-home">https://home.army.mil/hawaii/ptaeis/project-home</a> ) under the "Documents" tab.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	In Section 3.3.4.2 under the Wildlife Fire Management heading, please provide a map showing the high-risk areas on the State-owned lands in relation to biological and historic and cultural sensitive areas.	It should be noted that during red flag conditions, drought, and the general ecological condition of the area, the entire region is a fire risk. Figures showing the extent and burn severity of the Leilani fire, in relation of biological and in relation to historic and cultural sensitive areas, have been added to Sections 3.3.4 and 3.4.4.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	Under the Leilani Fire heading, please elaborate further regarding your statement that "Further action to ensure all wildland fire and range SOPs are in force has been undertaken."	Section 3.3.4 has been updated with more recent scientific data and surveys and wildland fire analysis in Section 3.3.6 have been revised. Mitigation measures the Army would consider include: (1) a multi-year research project to identify possible biological controls in the native range of <i>C. setaceus</i> (fountain grass); (2) installation invertebrate surveys; (3) an ungulate impact assessment; (4) negotiation of an agreement with the State to monitor wildfires on land not retained; and (5) implementation of additional thermal technology. These mitigation measures have been added to the Mitigation Measures subsection. Additionally, PTA is in the process

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
			of updating their Integrated Wildland Fire Management Plan.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	Please include more information regarding the Hawaiian goose monitoring protocol.	Additional information on PTA's Hawaiian goose protocol has been added to Appendix K.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	Under the Game Management Program heading, please include how often the field studies are conducted.	Additional game management information has been added to Section 3.3.4.2.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	Under the Invasive Species Management heading, please provide more information regarding the PTA Invasive Pest Prevention SOPs.	Additional information on PTA Invasive Pest Prevention SOPs has been added about to Section 3.3.4.2.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	Section 3.3.4.3 under the Native Plants heading, the discussion should be updated to reflect the correct number of native plants located on State-owned lands. If we are reading the tables correctly, it would appear that there is a total of 32 native species of which 20 are Federally and State-listed.	The EIS text has been revised to note that, "There have been up to 326 native plant species documented at PTA; of these species, 32 native plant species were documented on State-owned land at PTA. Twenty native plant species are also Federally and State-listed, the remaining 12 are listed in Table 3-6."
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	In Section 3.3.4.4 under the Protected Invertebrates heading, we note that DOFAWs comment regarding the anthracinan yellow-faced bee was not addressed. The data regarding the Blackburn's sphinx moth population in the ROI is unclear and there is no discussion on the presence of supporting habitat. Further the Second Draft EIS states that "There may be continued long-term, negligible, adverse impacts on the anthracinan yellow-faced bee and Blackburn's sphinx moth; these impacts would be considered negligible because these protected invertebrates have not been documented on State-owned land." This statement comes across as purely speculative considering that there have been no biological studies commissioned for the State-owned lands that would either confirm or deny the presence of these species.	The Army is in the process of preparing a Programmatic Biological Assessment to consult with the USFWS under section 7(a)(2) of the ESA for listed species that may be affected by installation activities, including the anthracinan yellow-faced bee and Blackburn's sphinx moth.  Additional habitat information has been provided for the anthracinan yellow-faced bee and Blackburn's sphinx moth. Section 3.3.4 and Appendix K have been updated with more recent scientific data and surveys. The Army will commit to invertebrate studies as a mitigation measure.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	Under the Native Birds heading, there is language regarding the differences between indigenous and endemic. This language should also be applied to the Native Plant section.	Additional text has been added to the native plant section, "Native plant species are classified as endemic or indigenous to help specify the geographic distribution and associated importance. An indigenous species is found in Hawai'i and other locations, while an endemic

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
			species is only found only in Hawai'i. Endemic species may be further limited to a specific area of the Hawaiian islands." and Table 3-6 has been updated.
Ryan Kanaka'ole (K. Tiger Mills, Staff Planner - OCCL)	Hawai'i State, Department of Land and Natural Resources	The OCCL notes the EIS repetitiously states how the State land is needed but does not mention how the land will be taken care of.	Please see General Response 1.
Ryan Kanaka'ole (K. Tiger Mills, Staff Planner - OCCL)	Hawai'i State, Department of Land and Natural Resources	While the OCCL was disappointed no restorative actions were included in the EIS, we do note that in accordance with the lease and under the provisions of existing law, the Army retains responsibility for cleanup and restoration activities under the Comprehensive Environmental Response, Compensation, and Liability Act process, which is outside this EIS.	Please see General Response 1.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	Under the Protected Birds heading please provide more information regarding what actions PTA implements to avoid and minimize project impacts to Hawaiian geese. We also request more information as to how the Hawaiian goose, band-rumped storm petrel, and Hawaiian petrel use PTA (e.g. breeding grounds, fly over, etc.)	Additional information on actions that PTA implements to avoid and minimize impacts to Hawaiian geese has been added to Appendix K. In compliance with the 2003 Biological Opinion PTA staff monitor for Hawaiian petrel and band-rumped storm-petrel presence and habitat use. Between September 2022 and September 2023 PTA Natural Resources staff used specially trained detector dogs to conduct 10 burrow surveys covering over 23 miles. Additionally, PTA natural resources staff assisted the Department of Natural Resources-Division of Forestry and Wildlife staff to survey for Hawaiian Petrel and Band-rump Storm Petrel at Mouna Loa. Additional information has been added to Appendix K. In 2016, it was determined that Hawaiian petrels do not use habitat at PTA; they fly over the installation and PTA continues to record Hawaiian petrel detections at the installation. There have been no documented activities for the Hawaiian petrel on State-owned land.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	In Section 3.4.6.1, under the Land Not Retained heading, it states that "new short-term, negligible, adverse impacts on historic and cultural resources" would result from lease compliance actions and cleanup and restoration activities. Please elaborate on what these impacts would be and why.	Section 3.4.6.1, 3.4.6.2, 3.4.6.3 and 3.4.6.4 Land Not Retained note that less than significant impacts could result from lease compliance actions and cleanup and restoration activities at the end of the lease.  Section 5.2.2 notes that lease compliance actions are not part of the Proposed Action and would be determined following expiration of the current lease and in

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
			accordance with the lease or otherwise negotiated with the State.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	In Section 3.3.5, an assumption is made that for land not retained "the State would increase access on land managed for public hunting." Was the Division of Forestry and Wildlife (DOFAW) consulted prior to making such an assumption?	The Section 3.3.5. hunting assumption was revised based on David G. Smith, DOFAW Administrator input. It now reads, "The State would add the State-owned land not retained north of DKI Highway to the Mauna Kea Forest Reserve and Kaohe Game Management Area (except for the DHHL-administered land), as applicable, which would increase access on land managed for public hunting (Section 3.2.5)."
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	Section 3.5.4.12 discusses depleted uranium. In conversation with the State Department of Health, Hazard Evaluation and Emergency Response Office, the hazard appears to be more about the heavy metal residue and having direct exposure to the heavy metals (e.g. Activities that cause soil disturbance which could blow dirt in someone's face where it could then enter their system and be digested). Please clarify if any soil disturbance activities occur in the area and what the BMPs are to limit exposure.	Section 3.5.4.12 notes that the 20-millimeter spotting rounds that contain depleted uranium were fired at the impact locations for four ranges, and all four impact locations are on the impact area (U.S. Government-owned land). Section 3.5.4.12 also states that per DoD Directive 4715.11, high-explosive munitions shall not be fired into the same area as depleted uranium (e.g., the impact locations for these four ranges), and per the NRC license, the Army cannot perform ground-disturbing activities within the depleted uranium ranges. Therefore, no soil disturbance activities occur in these areas.
Ryan Kanaka'ole (K. Tiger Mills, Staff Planner - OCCL)	Hawai'i State, Department of Land and Natural Resources	Further warfare training does not appear to be consistent with the objectives and policies of the Hawai'i State Plan [HRS Chapter 226] regarding the physical environment: land-based, scenic, natural beauty, and historic resources; nor the objectives and policies for socio-cultural advancement-culture. HRS §226-4 State goals says in part, "it shall be the goal of the State to achieve: ... (2) A desired physical environment, characterized by beauty, cleanliness, quiet, stable natural systems, and uniqueness, that enhances the mental and physical well-being of the people."	Please see General Response 1.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	In Section 3.9.4.3 please clarify how stormwater is contained to the installation.	Due to low rainfall and geology, there is little stormwater conveyed and drainage is not connected to streams, and that allows for infiltration on site. Section 3.9 discusses stormwater runoff at PTA.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	In Section 3.3.6.1, how was the conclusion of negligible adverse impacts to the anthracinan yellow-faced bee and Blackburn's sphinx moth reached without ever having conducted proper surveys?	There were no documented occurrences of the anthracinan yellow-faced bee and Blackburn's sphinx moth over the 2022-2023 U.S. Army Garrison PTA Natural Resources Program reporting period.

Responses to Second Draft EIS Comments

Commenter	Submitted By	Comment	Response
			<p>Additional habitat information has been provided for the anthracinan yellow-faced bee and Blackburn’s sphinx moth. Appendix K has been updated with additional species habitat informaiton. The Army will commit to invertebrate surveys as a mitigation measure.</p>
<p>Ryan Kanaka’ole(Russel I Y. Tsuji, Administrator - Land Division)</p>	<p>Hawai’i State, Department of Land and Natural Resources</p>	<p>In Section 4.4.2, please elaborate on the short-term impacts on the Hawaiian goose, Hawaiian hoary bat, and seabirds as determined in the Cantonment Facilities improvement Program Environmental Assessment.</p>	<p>The Cantonment FIP EA indicated that construction would have no impact on critical habitat, although there would be short-term, less than significant, impacts on the Hawaiian goose (elevated noise and potential for vehicle strikes during construction), Hawaiian hoary bat (risk of colliding with construction equipment, noise at night could interfere with echolocation), and Hawaiian petrel and band-rumped storm petrel (nighttime light sources during construction could disrupt navigation); also, there would be no effect for Blackburn’s sphinx moth and yellow-faced bees. Section 7 consultation with the USFWS for the Cantonment FIP EA resulted in a determination that the proposed program was not likely to adversely affect the Hawaiian goose, Hawaiian hoary bat, Hawaiian petrel, or band-rumped storm petrel with implementation of identified avoidance and minimization measures.</p>
<p>Ryan Kanaka’ole (Russell Y. Tsuji, Administrator - Land Division)</p>	<p>Hawai’i State, Department of Land and Natural Resources</p>	<p>It is also unclear what the impacts of the action are on the Hawaiian hoary bat. Impacts to its habitat are mentioned, but not the species itself.</p>	<p>Per the Incidental Take Statement in the 2003 BO, incidental take for the Hawaiian hoary bat is indirectly measured by degradation or destruction of potential available treeland roosting habitat; there are no statewide estimates available for the Hawaiian hoary bat. Acoustic activity analyses and occupancy modeling show that bats are present across the installation throughout the year and that activity peaks during the autumn months. The EIS text has been revised to reflect updated information.</p> <p>Additional information has been added to Section 3.3.4.1 regarding consultation as a part of the draft Programmatic Biological Assessment, for which consultation with USFWS is anticipated to be completed by the end of 2025.</p>

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	On page 3-55 there is a list of permits that the Army would apply for to comply with HAR Chapter 13-107, HAR Chapter 13-124, and HRS 195D that are not included in Table ES-2. Please review accordingly.	Tables ES-2 and 1-1 have been revised to include the permits noted in Section 3.3.6.1.
Ryan Kanaka'ole (K. Tiger Mills, Staff Planner - OCCL)	Hawai'i State, Department of Land and Natural Resources	Cooper Airfield that appears to breach the Kaena/MacKenzie Trail shows up on Google Earth Pro since 2010. Should this be a security issue, consider contacting Google Earth Pro to remove the aerial view.	Please see General Response 1.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	Section 3.5.4 references an External Standard Operating Procedures. Please include a copy of that document along with the 2017 Environmental Condition of Property (ECOP) in the appendices.	Not all referenced documents are included as appendices. The USAG-PTA External Standard Operating Procedures is an internal document that is not available for public disclosure. Appendix E includes relevant information from the SOP. Links to the Phase I and II ECOPs and other referenced documents have been added to the PTA EIS website ( <a href="https://home.army.mil/hawaii/ptaais/project-home">https://home.army.mil/hawaii/ptaais/project-home</a> ) under the "Documents" tab.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	In Section 3.5.4.2 it mentions that there are temporary storage facilities for hazardous wastes on the State-owned lands. Please elaborate on what types of hazardous wastes are stored and the BMPs for storage and transportation to the Cantonment.	Section 3.5.4.2 revised to note that hazardous wastes are stored on the Cantonment (U.S. Government-owned land), not on State-owned land. Used hazardous substances generated within the State-owned land are limited to used batteries, petroleum products, and vehicle maintenance fluids. If a spill occurs, contaminated soils are immediately removed and stored in appropriate containers at the Cantonment for off-site disposal.  The existing management measures for hazardous substances and hazardous wastes are provided in Section 3.5.4.14 and Appendix E.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	In Section 3.15.4 under the Potable Water heading, please provide a discussion about the proposed production water well at the Cantonment that is mentioned in Table 4-1.	Cumulative impacts are addressed in Chapter 4, not Chapter 3. The production water well previously proposed to be placed in the Cantonment (U.S. Government-owned land) has been removed from Chapter 4 because it is no longer planned or programmed since the PTA Real Property Master Plan was completed in 2020.
Ryan Kanaka'ole (K. Tiger Mills, Staff Planner - OCCL)	Hawai'i State, Department of Land and Natural Resources	Other previous comments by OCCL were regarding military training that involves maneuvers, ammunition, artillery and mortar systems, depleted uranium, explosives, firing points, hazardous materials and waste,	Links to unclassified Range SOPs have been added to Chapter 6 of the EIS and the project website: <a href="https://home.army.mil/hawaii/7817/1350/6634/PTA_AT_LR_Website_Supporting_Documents.pdf">https://home.army.mil/hawaii/7817/1350/6634/PTA_AT_LR_Website_Supporting_Documents.pdf</a> BMPs,

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>live fire, unexploded ordnance, and weapons system and waste or disposal facilities. The response was military personnel training at PTA follow several requirements for range operations, maintenance, and clearing including the Pōhakuloa Training Area Range Operations Standard Operating Procedures (2022), the U.S. Army Garrison, Pōhakuloa (USAG-PTA) External Standard Operating Procedures (2018) and the Military Munition Rule. Further references in the EIS refer to Appendix E that lists the NEPA documents completed, as well as best management practices (BMPs), standard operating procedures (SOPs), management measures, and mitigation measures used by the Army at PTA. Within the Appendix it is stated that construction and use of the training facilities and infrastructure predates the lease, NEPA regulations or the NEPA documents have been lost over time. However, most of the documents listed are dated after the year 2000 and should be accessible. The Pōhakuloa Training Area Range Operations Standing Operating Procedures (2022) appears to be what is currently in place. Applicable and relevant observed SOPs should be expected and readily available for different activities, companies to battalions, and visitors to PTA. Please include unclassified SOPs, BMPS, management and mitigation documents that pertain to the State land leased area such as the SOPs mentioned above in the EIS.</p>	<p>management measures, and mitigation measures are outlined in links to available documents on the project website, including: 2003 Biological Opinion, 2004 SBCT FEIS and ROD, 2008 Biological Opinion, 2018 PTA Training Section 106 Programmatic Agreement, Biennial Reports 2022-2023 (most recent).</p>
<p>Ryan Kanaka’ole (Russell Y. Tsuji, Administrator - Land Division)</p>	<p>Hawai’i State, Department of Land and Natural Resources</p>	<p>In Section 5.3.2, please describe other pathways that the Army may pursue should a Conservation District Rule Amendment not be approved by the Board.</p>	<p>Sections 1.4.2, 3.2, and 5.3.2 have been revised to make clear that for analysis purposes, the EIS assumes BLNR would establish a special subzone in the conservation district that allows for military training use.</p>
<p>Ryan Kanaka’ole(K. Tiger Mills, Staff Planner - OCCL)</p>	<p>Hawai’i State, Department of Land and Natural Resources</p>	<p>The EIS correctly notes military use is not included as an allowable use for any conservation district subzone. However, Section 3.2.5 Methodology and Significance Criteria incorrectly states: “The State would accept a petition for, and authorize, a special subzone in the conservation district under HAR Section 13-5-16 to allow military and conservation uses of the State-owned land retained by the Army.” The process to create a Special Subzone involves a rule amendment to HAR</p>	<p>Sections 1.4.2, 3.2, and 5.3.2 have been revised to clarify the process would be a rule amendment. Sections 1.4.2, 3.2, and 5.3.2 have also been revised to make clear that for analysis purposes, the EIS assumes BLNR would establish a special subzone in the conservation district that allows for military training use.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>Chapter 13-5. In reviewing HAR §13-5-5 Amendments notes: “(a) Whenever any landowner or government agency whose property is directly affected by this chapter makes an application to change the boundaries or identified land uses of any subzone, rezone a subzone, establish a new subzone with certain identified land uses or when a person seeks to otherwise amend this chapter, or where the board proposes to make a change or changes itself, the change or changes shall be put in the form of a proposed amendment of this chapter by the applicant, complete with necessary maps, four copies of which shall be filed with the board. (b) Procedures for amending this chapter are prescribed in section 183C-4, HRS, as amended and chapter 13-1, subchapter 3.” It is unclear if a petition for a rule amendment to HAR, Chapter 13-5 entitled Conservation District, is an option for a leaseholder. Therefore, it appears to be speculative to say that the State would accept a petition and authorize a special subzone for military use when: it is unclear if a petition to amend the existing Conservation District subzone is appropriate; it is unclear what the outcome of any proposed rule amendment process will determine; and the decision to allow, modify, or deny the proposed rule amendment is at the Board of Land and Natural Resources discretion.</p>	
<p>Ryan Kanaka’ole(K. Tiger Mills, Staff Planner - OCCL)</p>	<p>Hawai’i State, Department of Land and Natural Resources</p>	<p>Further per HRS §183C-1: “The legislature finds that lands within the state land use conservation district contains important natural resources essential to the preservation of the State's fragile natural ecosystems and the sustainability of the State's water supply. The intent of regulating land uses in the conservation district is for the purpose of conserving, protecting, and preserving the important natural and cultural resource of the state through appropriate management and use to promote their long-term sustainability and the public health, safety, and welfare.” In addition, HRS §205-2 (e): Conservation districts shall include areas necessary for protecting watersheds and water sources; preserving scenic and historic areas; providing park lands, wilderness, and beach reserves; conserving</p>	<p>Sections 1.4.2, 3.2, and 5.3.2 have been revised to clarify the process would be a rule amendment. Sections 1.4.2, 3.2, and 5.3.2 have also been revised to make clear that for analysis purposes, the EIS assumes BLNR would establish a special subzone in the conservation district that allows for military training use.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>indigenous or endemic plants, fish, and wildlife, including those which are threatened or endangered; preventing floods and soil erosion; forestry; open space areas whose existing openness, natural condition, or present state of use, if retained, would enhance the present or potential value of abutting or surrounding communities, or would maintain or enhance the conservation of natural or scenic resources; areas of value for recreational purposes; other related activities; and other permitted uses not detrimental to a multiple use conservation concept. Conservation districts shall also include areas for geothermal resources exploration and geothermal resources development, as defined under section 182-1. It would be difficult to create a Special Subzone for land uses that appear to be inconsistent with the intent of the Conservation District and State land use policy of HRS 205. Further as concluded by the Circuit Court, DLNR must improve their trust obligations to the public and future generations to mālama ‘āina. Conducting warfare activities with military munitions that include small-caliber, large-caliber, pyrotechnics, obscurants, recoilless rifle projectiles, rifle grenades, rockets, mortars, and artillery upon public lands contradicts mālama ‘āina.</p>	
<p>Ryan Kanaka‘ole (Russell Y. Tsuji, Administrator - Land Division)</p>	<p>Hawai‘i State, Department of Land and Natural Resources</p>	<p>Regarding the alternatives as presented in Section 2.2, where there is land being proposed to be returned to the State, there should be at minimum, a discussion regarding basic lease compliance actions as well as good faith commitments that the Army would propose regardless of what would be determined through negotiations with the Department. In addition, the No Action Alternative should include a discussion of clean up and restoration activities that could be considered reasonably foreseeable regardless negotiations needed for current lease compliance actions.</p>	<p>At this time, the Army is not able to commit to any lease compliance actions without the potential for negotiations with the State.</p>
<p>Ryan Kanaka‘ole (K. Tiger Mills, Staff Planner - OCCL)</p>	<p>Hawai‘i State, Department of Land and Natural Resources</p>	<p>The conclusion that “significant impacts could be reduced to less than significant through the State’s approval of a petition for a special subzone in the conservation district that would allow military training,” is faulty as impacts to the land and resources will occur no matter what the land</p>	<p>Compliance with HAR Chapter 13-5, Conservation District, has been revised and is discussed in Sections 1.4.2 and 5.3.2. Sections 1.4.2, 3.2, and 5.3.2 have also been revised to make clear that for analysis purposes, the EIS assumes BLNR would establish a special subzone in</p>

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
		is designated. Changing administrative rules does nothing to mitigate impact to the land and the natural and cultural resources from military training.	the conservation district through a rule amendment that allows for military training use.  Army use of the land conforming with HAR Chapter 13-5 Conservation District is not proposed mitigation. Conformance with HAR Chapter 13-5 would, however, reduce an otherwise significant adverse impact on land tenure. Impacts to the land or other natural and cultural resources are discussed in the other respective resource sections analyzed in Chapter 3.
Ryan Kanaka'ole (David G. Smith, Administrator - DOFAW)	Hawai'i State, Department of Land and Natural Resources	The public, DLNR, and the Hawaii Police Department should be provided access to the military shooting range for firearms training.	Please see General Response 1.
Ryan Kanaka'ole (David G. Smith, Administrator - DOFAW)	Hawai'i State, Department of Land and Natural Resources	Units 20 and 22 of the State-owned lease lands about Pu'u Anahulu GMA. DLNR- DOFAW has the Anahulu I fence in progress along this boundary (REPI-funded fencing, the fence will attach to the PTA fence on the boundary). DOFAW is required to get access permits so that DOFAW and PCSU staff may utilize the PTA/Pu'u Anahulu boundary road. The road is primarily located on the State-owned lease lands but also crosses over the boundary into Pu'u Anahulu GMA. An access buffer along that road would allow DOFAW staff and their contractors to access these areas from Highway 190 through the Pu'u Anahulu GMA, without needing to get permits for access or contact range control. Permits are annual and require a criminal background check, which is cumbersome.	Please see General Response 1.
Ryan Kanaka'ole (K. Tiger Mills, Staff Planner - OCCL)	Hawai'i State, Department of Land and Natural Resources	Given the noted conclusion under "Unavoidable Significant Adverse Impacts" regarding Cultural Practices and Environmental Justice, a much more robust dialogue with the people of Hawaii is expected. Perhaps other alternatives, off site mitigation, compromises could be identified. Community building, conviviality, improved relationships, and understanding are usually the results of community engagement. Community discussions and consultation should be enhanced given the legacy of military training in Hawai'i.	Section 5.4 has been revised to reference the existing management measures and proposed mitigation measures detailed in Section 3.4, Historic and Cultural Resources and Cultural Practices, and Section 3.11, Environmental Justice.
Ryan Kanaka'ole (K. Tiger Mills,	Hawai'i State, Department of	The OCCL has the same concerns as previously stated in the first draft EIS. The proposed use is inconsistent with	BMPs, management, and mitigation measures are outlined in documents on the project website, including:

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
Staff Planner - OCCL)	Land and Natural Resources	the Conservation District and State land use policy. The OCCL notes it appears Table ES-3 Potential Environmental Impacts concludes that the no action alternative would provide the best benefits to the land, the cultural resources and the traditional practices, and the people (environmental justice) of Hawai'i.	2003 Biological Opinion, 2004 SBCT FEIS and ROD, 2008 Biological Opinion, 2018 PTA Training Section 106 Programmatic Agreement; Biennial Reports 2022-2023 (most recent).
Ryan Kanaka'ole (David G. Smith, Administrator - DOFAW)	Hawai'i State, Department of Land and Natural Resources	DOFAW requests access to rock and cinder quarries within training areas 5, 9, 13, and 21 on PTA lease land for DOFAW projects on adjoining managed lands such as road and firebreak maintenance, provided that the materials are safe from hazardous materials.	The Army has taken DOFAW's suggestions under consideration.
Ryan Kanaka'ole (David G. Smith, Administrator - DOFAW)	Hawai'i State, Department of Land and Natural Resources	Water wells on leased land could provide water to DOFAW for forest restoration, fire suppression, plant nursery, and facilities.	There are no water wells on the leased land or on federally-managed lands.
Ryan Kanaka'ole (David G. Smith, Administrator - DOFAW)	Hawai'i State, Department of Land and Natural Resources	Appropriate signage marking the boundary of PTA should be posted.	The Army is evaluating additional boundary marking signage.
Ryan Kanaka'ole (David G. Smith, Administrator - DOFAW)	Hawai'i State, Department of Land and Natural Resources	The areas not retained in Alternative 2 do not have any records of T&E plants. The areas not retained in Alternative 3 have a number of T&E plant species and are important areas for the recovery of those plants.	Please see General Response 1.
Ryan Kanaka'ole (David G. Smith, Administrator - DOFAW)	Hawai'i State, Department of Land and Natural Resources	PTA and its contractors should not use any roads, including the old Saddle Road, within the Mauna Kea Forest Reserve, South of DKI.	Old Saddle Road is administered by the County of Hawai'i, which has granted PTA exclusive use of the approximately 11-mile segment of Old Saddle Road within PTA. The Army uses the portion of Old Saddle Road within the PTA boundary consistent with County of Hawai'i permissions. Other roads within PTA are not within the Mauna Kea Forest Reserve.
Ryan Kanaka'ole (David G. Smith, Administrator - DOFAW)	Hawai'i State, Department of Land and Natural Resources	DOFAW would like public and management access to Pu'u Anahulu GMA from DKI through the Army's fee simple land (Keamuku) in two locations (see attached map).	The Army has taken DOFAW's suggestions under consideration.
Ryan Kanaka'ole (David G. Smith, Administrator - DOFAW)	Hawai'i State, Department of Land and Natural Resources	We recommend allowing non-exclusive use of the leased areas that are outside of the fenced portions bordering Pu'u Anahulu ahupua'a.	The Army has taken DOFAW's suggestions under consideration and will further coordinate with your staff.

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
Ryan Kanaka'ole (David G. Smith, Administrator - DOFAW)	Hawai'i State, Department of Land and Natural Resources	DOFAW requests DoD provide increased mammal and bird hunting on lease land on days when there is no training. We have reached out to USAG-HI Department of Public Works, Environmental Division on several occasions. Staffing was the issue. DLNR DOCARE and DOFAW staff are willing to assist in staffing these hunts. Details of how PTA and DLNR will cooperate on hunting should be more clearly defined. Feral sheep and goats are overgrazing the existing vegetation and causing severe damage to native dry forests on State lease land and Palila Critical Habitat. High animal numbers should be significantly reduced immediately, preferably with increased public hunting.	Currently, public hunting on PTA is available on weekends and national holidays, pending training compatibility and in compliance with the 2022 PTA hunting policy and iSportsman management. The Army will work with DOFAW on a collaborative hunting program.
Ryan Kanaka'ole (K. Tiger Mills, Staff Planner - OCCL)	Hawai'i State, Department of Land and Natural Resources	The incompatibility of military training with the cultural and traditional practices of the Hawaiian people, mālama 'āina, and potentially with Hawai'i State law are unresolved issues and should be stated in the EIS with improved information regarding resolution prior to commencement or what overriding reasons there are for proceeding without resolution.	Section 5.4 has been revised to reference the existing management measures and proposed mitigation measures detailed in Section 3.4, Historic and Cultural Resources and Cultural Practices, and Section 3.11, Environmental Justice.  Text in Section 5.6 that discusses the rationale for proceeding with the Proposed Action has been moved to Section 5.4, Unavoidable Significant Adverse Impacts.
Ryan Kanaka'ole (K. Tiger Mills, Staff Planner - OCCL)	Hawai'i State, Department of Land and Natural Resources	Please consider removing barb wire from the Conservation District where it may affect indigenous wildlife such as 'ōpe'ape'a.	Over the 2022-2023 U.S. Army Garrison PTA Natural Resources Program reporting period, there was no incidental take of the Hawaiian hoary bat from barbed wire. Barbed wired is used judiciously and only when necessary for security purposes. Quarterly inspections are done in compliance with the 2008 Biological Opinion.  The Section 3.3.4.4 has been revised to reflect updated information.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	Figure 2-2 should be revised to clearly call out the DHHL lands no longer being retained.	Callout for "250 acres of State-Owned Land Administered by DHHL" added to Figure 2-2.
Ryan Kanaka'ole (David G. Smith, Administrator - DOFAW)	Hawai'i State, Department of Land and Natural Resources	Training areas 20 and 22 are adjacent to portions of the Pu'u Anahulu GMA and contain some of the highest concentration of T&E species in the area, along with the highest quality forest and shrubland. Training action poses threats to these resources as demonstrated by the	Section 3.3.4 and Appendix K have been updated with more recent scientific data and surveys.  Mitigation measures the Army would consider include: (1) a multi-year research project to identify possible

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
		17,712 acre Leilani Fire of August of 2022 which originated within PTA. Lidar shapefiles for native forest cover were used as an overlay to estimate native forest burned and it is estimated at 2500 acres impacted in the Pu`uanahulu GMA. Those 2,500 acres of burned ohia/native forest represented what was some of the best remaining forest and likely represented about 50% or more of what was left in Pu`uanahulu of that habitat type. The Anahulu I conservation unit was originally planned to fence and protect 280 acres containing six endangered species and at least six locally rare species (or species of concern). This unit has been reduced by half to 140 acres due to damage from the Leilani fire.	biological controls in the native range of <i>C. setaceus</i> (fountain grass); (2) installation invertebrate surveys; (3) an ungulate impact assessment; (4) negotiation of an agreement with the State to monitor wildfires on land not retained; and (5) implementation of additional thermal technology. These mitigation measures have been added to the Mitigation Measures subsection.
Ryan Kanaka`ole (David G. Smith, Administrator - DOFAW)	Hawai`i State, Department of Land and Natural Resources	Ancient and Historic trails and associated archeologic features data should be shared with DLNR's Nā Ala Hele Trails and Access Program. Per HRS 198D, the Nā Ala Hele program serves as the consulting agency regarding trails. All 6E and 106 compliance processes should include consultation with the Hawai`i Island Nā Ala Hele staff. Additionally, the applicant should facilitate site visits with Nā Ala Hele staff.	Section 3.4.2.1, clarifies that this EIS complies with the requirements of NEPA and HEPA. Since the Proposed Action is an administrative action, which is not the type of undertaking that has the potential to cause an effect on historic properties, Section 106 consultation regarding the proposed action is not required. Section 5.3.1 notes that ongoing activities facilitated by the Proposed Action have established mitigation measures through the 2018 Programmatic Agreement executed with SHPD and the Advisory Council on Historic Preservation. Section 5.3.2 discusses that compliance with Chapter 6E would occur after the EIS process.
Ryan Kanaka`ole(David G. Smith, Administrator - DOFAW)	Hawai`i State, Department of Land and Natural Resources	Typically, an Archeological Inventory Survey is included in the EIS process. DLNR recommends an AIS is done.	Section 3.4.4.6 discusses the Army's CRM Program at PTA, including the State-owned land. Previous archaeological surveys are provided in Table 3-14 of the EIS. Section 3.4.4.3 discusses why portions of State-owned land have not been surveyed.
Ryan Kanaka`ole (David G. Smith, Administrator - DOFAW)	Hawai`i State, Department of Land and Natural Resources	The Second Draft EIS refers to "multiple studies, including a monarch flycatcher study done on Schoffield Barracks and Makua Military Reservation" that have documented wildlife habituating to noise associated with training activities. Please provide the complete references for these studies and any relevant data that may support these claims.	A link to the 2001 monarch flycatcher study and additional noise studies have been added to Chapter 6 of the EIS as well as the PTA EIS website ( <a href="https://home.army.mil/hawaii/ptaeis/project-home">https://home.army.mil/hawaii/ptaeis/project-home</a> ) under the "Documents" tab.
Ryan Kanaka`ole (David G. Smith,	Hawai`i State, Department of	Please provide access to all Biological Opinions (BO) that have been cited, with supporting data, specifically those	Links to the 2003, 2008, and 2013 BOs have been added to Chapter 6 of the EIS as well as the PTA EIS website

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
Administrator - DOFAW)	Land and Natural Resources	that pertain to Hawaiian hoary bat ( <i>Lasiurus semotus</i> ), Hawaiian goose ( <i>Branta sandvicensis</i> ), Band-rumped storm petrel ( <i>Oceanodroma castro</i> ) and Hawaiian petrel ( <i>Pterodroma sandwichensis</i> ). This will facilitate a review of the stated impacts from training and the proposed mitigation actions (e.g., quarterly inspections of barbed wire fences for hoary bat take vs. removing all barbed wire fences).	( <a href="https://home.army.mil/hawaii/ptaeis/project-home">https://home.army.mil/hawaii/ptaeis/project-home</a> ) under the "Documents" tab.
Ryan Kanaka'ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai'i State, Department of Land and Natural Resources	Alternative 3 states that there may be a potential to "replicate" some of the facilities elsewhere as those facilities no longer be accessible under this alternative. Please elaborate further on what those facilities are and where those facilities could reasonably be sited. Also, it is unclear how exactly the loss, especially if the facilities could be replicated, would affect the combat readiness of USARHAW.	As noted in Section 2.2.3, replicating lost training and support facilities (i.e., 1 ammunition holding area, 2 landing zones, and 30 firing points) and associated roads and training trails is not part of Alternative 3 and would require separate NEPA and HEPA analysis, as applicable. These actions are not planned so there is no information on when or where replication of these facilities could occur in the future. This text is provided in the EIS to daylight the actions that the Army could take in the future to partially make up for the loss of maneuver areas and training and support facilities under Alternative 3.  Text added to Section 2.2.3 to clarify how combat readiness would be impacted under Alternative 3, such as less maneuver area (decreases training options), having to spend training money on construction of new training and support facilities and associated roads and training trails, loss of training facilities between the end of the current lease and replication of some of these facilities, and not being able to replicate all of the lost training and support facilities and associated roads and training trails.
Ryan Kanaka'ole (David G. Smith, Administrator - DOFAW)	Hawai'i State, Department of Land and Natural Resources	Lights should be shielded and pointed downward to avoid impacts to seabirds.	Table 3-12 notes that the Army complies with the 2023 "Memorandum for All Military Personnel and Department of Defense Civilian Employees within United States Army Garrison, Hawaii (USAG-HI) Installations: Policy Memorandum USAG-HI-35, Wildlife Friendly Lighting and Dark Skies" which includes, but is not limited to:  * Night lighting that might impact protected sea birds should be managed where applicable, particularly between the months of September through December, to limit light-induced disorientation.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
			<p>* Exterior lighting fixtures must follow specific designs and should be on only when needed, be only as bright as necessary, be used only in areas that need it, be fully shielded (pointing downward), and minimize blue light emissions.</p> <p>* Any individual who observes a disoriented bird flying around a light is encouraged to immediately turn off the light until the bird departs.</p>
<p>Ryan Kanaka'ole (David G. Smith, Administrator - DOFAW)</p>	<p>Hawai'i State, Department of Land and Natural Resources</p>	<p>The description of impacts on wildlife and natural resources is vague and the discussion of avoidance or mitigation actions is limited. This needs to be addressed in the final version of the EIS.</p>	<p>The phasing, timing, and description of mitigation measures to address significant adverse impacts are included in the Final EIS, and will be committed to in the Record of Decision; however, should a lease option be pursued, discretionary decisions made by the Board of Land and Natural Resources may identify additional measures.</p>
<p>Ryan Kanaka'ole(Jessica Puff, Architecture Branch Chief &amp; Acting Administrator - SHPD)</p>	<p>Hawai'i State, Department of Land and Natural Resources</p>	<p>As expressed in comments previously provided by SHPD in consultation meetings with the U.S. Army, SHPD requests that archaeological inventory surveys be completed for the entirety of the State-owned portion of PTA in accordance with the Hawaii Revised Statutes (HRS) §6E historic preservation review process as part of the development of a draft Environmental Impact Statement (EIS). The draft as proposed fails to set forth sufficient information to enable SHPD, DLNR, and the public to fully consider the potential impacts of the proposed action and preferred alternative, as required per HRS Chapter 343. SHPD notified the U.S. Army in consultation meetings that the process proposed in the Draft EIS, which would involve conducting cultural inventory surveys following the EIS process, would result in a draft deficient per Chapter 343 standards and Chapter 6E standards. As a result of this lack of sufficient information, SHPD is unable to adequately assess the potential environmental impacts to cultural resources within each of the proposed retention areas.</p>	<p>Section 3.4.4.6 discusses the Army's CRM Program at PTA, including the State-owned land. Previous archaeological surveys are provided in Table 3-14 of the EIS. Section 3.4.4.3 discusses why portions of State-owned land have not been surveyed. Section 3.4.2.1, clarifies that this EIS complies with the requirements of NEPA and HEPA. Since the Proposed Action is an administrative action, which is not the type of undertaking that has the potential to cause an effect on historic properties, Section 106 consultation regarding the proposed action is not required. Section 5.3.1 notes that ongoing activities facilitated by the Proposed Action have established mitigation measures through the 2018 Programmatic Agreement executed with SHPD and the Advisory Council on Historic Preservation. Section 5.3.2 discusses that compliance with Chapter 6E would occur after the EIS process.</p>
<p>Ryan Kanaka'ole (Jessica Puff, Architecture Branch Chief &amp; Acting</p>	<p>Hawai'i State, Department of Land and Natural Resources</p>	<p>The archaeological survey data provided for State-owned lands is inadequate. Maps showing the spatial extent of completed surveys and the spatial locations of documented cultural resources (at variable scales, ranging from individual resources to cultural landscapes or</p>	<p>It is Army practice to protect the location of sensitive sites. Section 3.4.4.3 describes why certain areas have not been surveyed. Figures are provided to show where surveys have been completed and the general locations and types of sites within State-owned lands.</p>

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
Administrator - SHPD)		traditional cultural properties) are not provided. Such spatial information is critical to providing an accurate baseline of survey coverage (and gaps) for assessing impacts.	
Ryan Kanaka'ole (Kathryn E. Stanaway, Acting Wildlife Program Manager - DOFAW)	Hawai'i State, Department of Land and Natural Resources	DOFAW concurs with the measures included in the DEIS intended to avoid operational impacts to State-listed species including the 'ōpe'ape'a or Hawaiian Hoary bat ( <i>Lasiurus cinereus semotus</i> ), nēnē or Hawaiian Goose ( <i>Branta sandvicensis</i> ), pueo or Hawaiian Short-eared Owl ( <i>Asio flammeus sandwichensis</i> ), 'io or Hawaiian Hawk ( <i>Buteo solitarius</i> ), seabirds, nalo meli maoli or Yellow-faced Bee ( <i>Hylaeus</i> spp.), Blackburn's sphinx moth ( <i>Manduca blackburni</i> ), State-listed plants, and critical habitats for listed species. We appreciate the measures outlined to employ Best Management Practices to contain any soils and sediment with the purpose of preventing damage to near-shore waters and marine ecosystems, to minimize movement of plant and soil material to prevent the spread of invasive species, and to prevent wildfires.	Please see General Response 1.
Ryan Kanaka'ole (Kathryn E. Stanaway, Acting Wildlife Program Manager - DOFAW)	Hawai'i State, Department of Land and Natural Resources	On June 20th, 2024, DOFAW provided a comprehensive letter addressing concerns relating to access, hunting, fire suppression, threatened and endangered plant species, invertebrates, trails, and endangered wildlife. DOFAW provides the following additional comments regarding the potential for the proposed work to affect listed species in the vicinity of the project area.	Please see General Response 1.
Ryan Kanaka'ole (Jessica Puff, Architecture Branch Chief & Acting Administrator - SHPD)	Hawai'i State, Department of Land and Natural Resources	All known resources within the State-owned lands must be included in the EIS (e.g., lava tube containing sacred cultural objects identified in 2022) and SHPD concurrence with the U.S. Army's assessments of the integrity and site significance of these resources.	With the exception of sensitive information not disclosed at Consulting Parties' request, all data pertaining to archaeological sites within the state-owned lands have been provided in the EIS.
Ryan Kanaka'ole(David G. Smith, Administrator - DOFAW)	Hawai'i State, Department of Land and Natural Resources	Any federally listed plant species on state lands leased to PTA should be fenced individually or collectively where appropriate. A 50-foot managed fuel break should be installed around each plant or plant cluster and maintained for the life of the lease. Signage informing active-duty personnel, contractors, and the public informing them of the status of the area should be	PTA employs a fuel break system of 14 fuel breaks of approximately 39 miles; approximately 20 miles are on State-owned land. The fuel break system that includes State-owned land and the Kīpuka Kālawamauna endangered plant habitat incorporates varying widths of vegetation control and firebreak road. There are five fuel monitoring corridors covering approximately 35 miles;

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		included and marked as appropriate for each plant or cluster.	two fuel monitoring corridors, Keamuku and Eastern, are all or partially on State-owned land covering approximately 10 miles. Additional information on fuel breaks can be found in Section 3.3.4.2. PTA has 28 miles of ungulate exclusion fencing surrounding 8,500 acres on State-owned land at PTA. The Leilani fire burned approximately 11.4 miles of ungulate fencing, approximately 4.7 miles of fencing burned was on State-owned land at PTA and is fully functional. Table 3-3 describes exclusion fence unit around protected species. Signage placement is placed strategically throughout PTA, to inform appropriate parties of areas that have sensitive features.
Ryan Kanaka'ole (Jessica Puff, Architecture Branch Chief & Acting Administrator - SHPD)	Hawai'i State, Department of Land and Natural Resources	Pursuant to the Programmatic Agreement (2018) SHPD requests the second draft EIS be revised to provide documentation of the efforts taken, and the results thereof, by the US Army Garrison-PTA to complete archaeological surveys since the PA was executed in September 2018 and, if none have occurred to provide rationale why none were undertaken in support of the proposed Army Training Land Retention at Pōhakuloa Training Area EIS. The most recent archaeological survey referenced in the draft EIS is Monahan et al. (2013).	The Army is in compliance with the 2018 Programmatic Agreement which applies to both U.S. Government-owned and State-owned land. Stipulations in the Programmatic Agreement require survey of areas with planned development. Recent development has been focused on U.S. Government-owned lands.  Section 3.4.4.6 discusses the Army's CRM Program at PTA, including the State-owned land. Previous archaeological surveys are provided in Table 3-14 of the EIS. Section 3.4.4.3 discusses why portions of State-owned land have not been surveyed.
Ryan Kanaka'ole (David G. Smith, Administrator - DOFAW)	Hawai'i State, Department of Land and Natural Resources	Page 3-45 lists impacts of invasive plants but does not include the risk of moving invasive species to PTA from other Training Areas (i.e. Chromolaena odorata, CRB). This potential should be included in the NEPA documents.	Section 3.3.4.4 includes information on Army education regarding the risk of invasive animal transportation. The Army practices additional best management practices by washing down vehicles and equipment to prevent invasive species spread. Additional text regarding the risk of transporting invasive plant species between training areas has been included in Section 3.3.4.3.
Ryan Kanaka'ole (Jessica Puff, Architecture Branch Chief & Acting Administrator - SHPD)	Hawai'i State, Department of Land and Natural Resources	The second draft EIS includes a Cultural Impact Assessment (CIA). The CIA is insufficient. SHPD notes the completion of CIA surveys by 240 individuals. SHPD recommends closer analysis of the survey responses in the report and the USAG-PTA undertake an effort to individually interview a larger number of knowledgeable persons with strong cultural connections to PTA. Additionally, important information provided in an earlier	The first draft CIA was revised to improve readability, focus analysis within the project area and broad geographical area, and add information from new survey respondents and interviews. No information provided by the interviewee and survey respondents was removed from the DEIS CIA.  Section 2.2 of the CIA details the three public outreach

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>draft has been removed. While SHPD supports development and implementation, in consultation with Native Hawaiians, of a cultural access plan, additional identification and/or mitigation recommendations are needed (e.g., a conducting a Traditional Cultural Properties (TCP) study; providing references and summaries for all studies conducted within PTA or the vicinity).</p>	<p>methods used to identify potential individuals who have expertise and knowledge of cultural resources, practices, and beliefs relevant to the project area and broad geographical area. This included 1) a publication in the Office of Hawaiian Affairs Ka Wai Ola for three months; 2) social media posts on Facebook and Instagram, leading to an online survey completed by 236 individuals; 3) direct outreach to specific organizations and individuals, as shown in Appendix A of the CIA.</p> <p>Section 3.4.2.1, clarifies that this EIS complies with the requirements of NEPA and HEPA. Since the Proposed Action is an administrative action, which is not the type of undertaking that has the potential to cause an effect on historic properties, Section 106 consultation regarding the proposed action is not required. Section 5.3.1 notes that ongoing activities facilitated by the Proposed Action have established mitigation measures through the 2018 Programmatic Agreement executed with SHPD and the Advisory Council on Historic Preservation. Section 5.3.2 discusses that compliance with Chapter 6E would occur after the EIS process.</p>
<p>Ryan Kanaka'ole(Jessic a Puff, Architecture Branch Chief &amp; Acting Administrator - SHPD)</p>	<p>Hawai'i State, Department of Land and Natural Resources</p>	<p>SHPD recommends both a TCP study and a kapa'aki analysis be completed as part of the EIS process. Both of these studies involve data gathering methods that have potential to provide critical information regarding cultural resources, cultural landscapes, and traditional cultural practices not fully captured by archaeological surveys, archival/historical research, or by a CIA. Although the U.S. Army initiated several TCP studies in the past, none were finalized. Additionally, a recent TCP nomination for a portion of Maunakea, outside the boundaries of PTA, has demonstrated that the entirety of Maunakea may potentially be evaluated as an eligible TCP and that an assessment of the full range of cultural resources within the State-owned lands and/or of the entirety of PTA is warranted. Additionally, the importance of completing a TCP study that includes PTA is necessary to adequately identify the full range of cultural resources present within the State-owned portion of PTA and to evaluate the</p>	<p>Section 3.4.2.1, clarifies that this EIS complies with the requirements of NEPA and HEPA. Since the Proposed Action is an administrative action, which is not the type of undertaking that has the potential to cause an effect on historic properties, Section 106 consultation regarding the proposed action is not required. Section 5.3.1 notes that ongoing activities facilitated by the Proposed Action have established mitigation measures through the 2018 Programmatic Agreement executed with SHPD and the Advisory Council on Historic Preservation. Section 5.3.2 discusses that compliance with Chapter 6E would occur after the EIS process. Section 3.4.2 explains that separate Section 106 consultation is also conducted for other activities that fall outside the parameters of the 2018 Section 106 PA for PTA. Section 3.4 of the EIS, the appended CIA (Appendix I), and the ALR (Appendix J) provide information that the State can reference for the State to conduct a Kapa'akai Analysis pursuant to the</p>

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
		environmental impacts related to the land retention alternatives.	State's obligation under Article 12, Section 7 of the Hawaii Constitution to protect Native Hawaiian Traditional and Customary Native Hawaiian Rights.
Ryan Kanaka'ole (David G. Smith, Administrator - DOFAW)	Hawai'i State, Department of Land and Natural Resources	In Section "3.3.4.4 – Wildlife, Native Invertebrates, the following is stated: "a study of terrestrial arthropods at PTA identified more than 485 species of arthropods from 21 sample sites and 28,413 individuals using multiple trap types and opportunistic observations(USAG-HI, 1998)" The 485 plus species should be adequately described and surveyed with adequate avoidance, minimization, and mitigation described for impacts to each native species and/or habitat area.	Section 3.3.4 has been updated with more recent scientific data and surveys. The Army will commit to invertebrate studies as a mitigation measure.
Ryan Kanaka'ole (Kathryn E. Stanaway, Acting Wildlife Program Manager - DOFAW)	Hawai'i State, Department of Land and Natural Resources	We appreciate your efforts to work with our office for the conservation of our native species. These comments are general guidelines and should not be considered comprehensive for this site or project. It is the responsibility of the applicant to do their own due diligence to avoid any negative environmental impacts. Should the scope of the project change significantly, or should it become apparent that threatened or endangered species may be impacted, please contact our staff as soon as possible. If you have any questions, please contact Kate Cullison, Protected Species Habitat Conservation Planning Coordinator via email at katherine.cullison@hawaii.gov.	Please see General Response 1.
Ryan Kanaka'ole (David G. Smith, Administrator - DOFAW)	Hawai'i State, Department of Land and Natural Resources	What are the locations of the acoustic detections of the Hawaiian Hoary Bat on State owned land(USAG-PTA, 2022a)? How many locations were surveyed?	There are 45 periodic sampling locations, 18 of which are on State-owned land, and 5 permanent sampling locations at PTA for the Hawaiian hoary bat, 3 are on State-owned land at PTA.  Clarifying text has been added to Section 3.3.4.4 of the EIS.
Ryan Kanaka'ole (Gordon C. Heit - Hawaii District Land Agent)	Hawai'i State, Department of Land and Natural Resources	The Hawaii District Land Office has reviewed the Second Draft Environmental Impact Statement (DEIS) and has no objection to its findings.	Please see General Response 1.
Ryan Kanaka'ole (David G. Smith, Administrator - DOFAW)	Hawai'i State, Department of Land and Natural Resources	What is the current status of the Band-rumped storm petrel(Oceanodroma castro) nests? What are the predicted impacts to the colony via the proposed alternatives?	The band-rumped storm-petrel was first identified at PTA in 2015 and was listed in 2016. Between September 2022 and September 2023 PTA Natural Resources staff used specially trained detector dogs to conduct 10 burrow

Responses to Second Draft EIS Comments

Commenter	Submitted By	Comment	Response
			<p>surveys covering over 23 miles; none of the band-rumped storm petrel burrows were documented on State-owned land at PTA.</p> <p>Section 3.3.4.4 and Appendix K has been updated with additional information.</p>
<p>Ryan Kanaka'ole(Jessica Puff, Architecture Branch Chief &amp; Acting Administrator - SHPD)</p>	<p>Hawai'i State, Department of Land and Natural Resources</p>	<p>The analysis of the cultural resources within the State-owned lands may only be accurately completed when evaluated within the broader PTA context, including areas reported as not surveyed due to access or security concerns (e.g., impact zone). Alternative survey methods need to be implemented to include these areas (e.g., oral history survey, lidar or drone, etc.).</p>	<p>Section 3.4.4.3 provides information on previous archaeological investigations at PTA. The section has been revised to explain that the survey projects conducted in the early 2000s included: a consolidation of all radiocarbon dates obtained through archaeological investigations; site distribution analysis across the installation by site type; and relation of site types to transportation sites. Section 3.4.2.1 clarifies that this EIS complies with the requirements of NEPA and HEPA. Since the Proposed Action is an administrative action, which is not the type of undertaking that has the potential to cause an effect on historic properties, Section 106 consultation regarding the proposed action is not required. Section 5.3.1 notes that ongoing activities facilitated by the Proposed Action have established mitigation measures through the 2018 Programmatic Agreement executed with SHPD and the Advisory Council on Historic Preservation. Section 5.3.2 discusses that compliance with Chapter 6E would occur after the EIS process. Section 3.4.2 explains that separate Section 106 consultation is also conducted for other activities that fall outside the parameters of the 2018 Section 106 PA for PTA.</p>
<p>Ryan Kanaka'ole (Jessica Puff, Architecture Branch Chief &amp; Acting Administrator - SHPD)</p>	<p>Hawai'i State, Department of Land and Natural Resources</p>	<p>Also pursuant to the Programmatic Agreement (2018) SHPD requests the second draft EIS be revised to provide documentation of the efforts taken by the US Army Garrison PTA (USAG- PTA) and the results of the evaluations of known archaeological properties for eligibility for listing in the National Register of Historic Places (NRHP). The PA indicates that 69% of the known archaeological historic properties distributed across the accessible land had not been evaluated but would be treated as eligible for the NRHP and adverse effects would be avoided in accordance with AR 200-1 Part 6-4(b)(9).</p>	<p>The Army treats all unevaluated archaeological resources as eligible for listing in the NRHP, including the 105 sites identified on state-owned land.</p> <p>Section 3.4.2.1 clarifies that this EIS complies with the requirements of NEPA and HEPA. Since the Proposed Action is an administrative action, which is not the type of undertaking that has the potential to cause an effect on historic properties, Section 106 consultation regarding the proposed action is not required. Section 5.3.1 notes that ongoing activities facilitated by the Proposed Action</p>

Responses to Second Draft EIS Comments

Commenter	Submitted By	Comment	Response
		The documentation and evaluation results should include identification of the spatial location of these historic properties, including whether on State-owned or under Federal-control and how each of the proposed alternatives would ensure “adverse effects would be avoided in accordance with AR 200-1 Part 6-4(b)(9).	<p>have established mitigation measures through the 2018 Programmatic Agreement executed with SHPD and the Advisory Council on Historic Preservation. Section 5.3.2 discusses that compliance with Chapter 6E would occur after the EIS process.</p> <p>Section 3.4.2 explains that separate Section 106 consultation is also conducted for other activities that fall outside the parameters of the 2018 Section 106 PA for PTA.</p>
Ryan Kanaka’ole (Kathryn E. Stanaway, Acting Wildlife Program Manager - DOFAW)	Hawai’i State, Department of Land and Natural Resources	The use of barbed wire should be avoided as ‘ōpe’ape’a mortalities have been documented as a result of becoming ensnared by barbed wire fencing during flight. If the use of barbed wire is unavoidable, consultation with DOFAW regarding a Habitat Conservation Plan associated with an Incidental Take License (ITL) for ‘ōpe’ape’a is recommended.	<p>In compliance with the 2008 BO, barbed wire inspections are conducted quarterly by the PTA Natural Resources staff. Only a single bat has been found impaled on a fence since 2008. Barbed wired is used judiciously and only when necessary for security purposes.</p> <p>Clarifying text added to the Section 3.3.4.4.</p>
Ryan Kanaka’ole (Kathryn E. Stanaway, Acting Wildlife Program Manager - DOFAW)	Hawai’i State, Department of Land and Natural Resources	The State listed nēnē or Hawaiian Goose (Branta sandvicensis) could potentially occur in the vicinity of the proposed project site. It is against State law to harm or harass these species. If any are present, all activities within 100 feet (30 meters) should cease and the bird or birds should not be approached. Work may continue after the bird or birds leave the area of their own accord. If a nest is discovered at any point, please contact the Hawai’i Island Branch DOFAW Office at (808) 974-4221 and establish a buffer zone around the nest.	<p>Over the 2022-2023 U.S. Army Garrison PTA Natural Resources Program reporting period, there were 40 Hawaiian goose detections at PTA. Thirteen of the Hawaiian geese detections were on State-owned land.</p> <p>Section 3.3.4.4 and Appendix K have been updated with additional information.</p>
Ryan Kanaka’ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai’i State, Department of Land and Natural Resources	Note that these comments apply to the other alternatives.	Your comment is acknowledged.
Ryan Kanaka’ole (Russell Y. Tsuji, Administrator - Land Division)	Hawai’i State, Department of Land and Natural Resources	Moreso, the Second Draft EIS (page 3-66) notes that “The 2018 Section 106 PA for PTA determined that previous military training and related activities have had adverse impact on historic properties at PTA, primarily within the impact area...continuing impacts on historic and cultural resources related to ongoing activities have already been assessed in previous NHPA consultation.” The document fails to elaborate on the outcome of that assessment and any associated mitigation measures that are now in place.	Section 3.4.2 explains that separate Section 106 consultation is also conducted for other activities that fall outside the parameters of the 2018 Section 106 PA for PTA. Section 3.4.4.6, Existing Management Measures, describes the Army’s Cultural Resource Management Program (CRM) at PTA. This includes the existing SOPs and management measures guided by the 2018 Integrated Cultural Resources Management Plan and the 2018 Section 106 PA. Section 3.4.6 details that there

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>Therefore, it would appear that the continuation of Army training at PTA may result in adverse impacts to historic/archaeological resources. Furthermore, it is mentioned that “the continued presence of training personnel may also continue to impact resources through accidental damage.” It is unclear how the management measures mitigate ongoing impacts, especially as the impact zone has not been surveyed. In addition, the document goes on to state that continuing impacts on historic and cultural resources related to ongoing activities have already been assessed in previous NHPA consultations” yet the results of those consultations have not been included in this document.</p>	<p>would be less than significant adverse impacts to historic and cultural resources under lease and fee simple title due to continued long-term, moderate, beneficial impacts on historic and cultural resources from the continuation of CRM programs and actions that preserve and protect historic and cultural resources. A link to the 2018 Section 106 PA and the 2018 ICRMP has been added to Chapter 6 of the EIS as well as the PTA EIS website (<a href="https://home.army.mil/hawaii/ptaeis/project-home">https://home.army.mil/hawaii/ptaeis/project-home</a>) under the “Documents” tab. EIS Section 1.4 provides the scope of the EIS, which includes a description of the Proposed Action, retention of State-owned land by the Army (an administrative action). The analysis of the Proposed Action therefore does not include historic and cultural resources on U.S. Government-owned lands at PTA such as the Impact Area. Section 5.3.1 notes that the Proposed Action would be consistent with the NHPA since ongoing activities facilitated by the Proposed Action have established mitigation measures through the 2018 Programmatic Agreement executed with SHPD and the Advisory Council on Historic Preservation. The PA is a 15-year agreement that will remain in effect until at least 2033.</p>
<p>Ryan Kanaka’ole (Kathryn E. Stanaway, Acting Wildlife Program Manager - DOFAW)</p>	<p>Hawai’i State, Department of Land and Natural Resources</p>	<p>The endemic pueo or Hawaiian short-eared owl (<i>Asio flammeus sandwichensis</i>) could potentially nest in the project area. Pueo nest on the ground and active nests have been found year-round. Before any potential vegetative alteration, especially ground-based disturbance, we recommend that line transect surveys are conducted during crepuscular hours through the project area. If a pueo nest is discovered, a minimum buffer distance of 100 meters from the nest should be established until chicks are capable of flight.</p>	<p>Over the 2022-2023 U.S. Army Garrison PTA Natural Resources Program reporting period NRP staff conducted avian surveys on 15 transects, including 8 on State-owned land. When projects are planned for areas in suitable Hawaiian short-eared owl habitat, PTA Natural Resources staff survey project sites for ground nesting birds and MBTA-protected species prior to vegetation disturbance and project implementation.</p> <p>Section 3.3.4.4 and Appendix K have been updated with additional information.</p>
<p>Ryan Kanaka’ole (Russell Y. Tsuji, Administrator - Land Division)</p>	<p>Hawai’i State, Department of Land and Natural Resources</p>	<p>Under the No Action Alternative, the document states that “Several of the training and support facilities and features within the State-owned land cannot be replicated within the U.S. Government-owned portions of PTA due to operational, safety, and environmental constraints...and are not available elsewhere in Hawai’i.” Please clarify if</p>	<p>Section 1.2 provides information on the strategic importance of Hawai’i for national defense and PTA’s role. Section 1.3 describes the purpose and need of the Proposed Action (retention of State-owned land at PTA). Alternatives that meet the ongoing purpose and need were carried forward for analysis.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>those training and support facilities and features could be replicated elsewhere in the continental U.S. Also, please elaborate on what kind of effort it would take to restation the USARHAW or 3rd Marine Regiment and what impacts that would have on the State of Hawai'i and the Army's mission.</p>	<p>Replicating training and support facilities and features is not part of the No Action Alternative, not planned, and would require separate NEPA and HEPA analysis, as applicable; therefore, no additional information is available.</p> <p>As stated Section 2.2.4, the No Action Alternative does not include but could result in the need to restation USARHAW and 3rd Marine Regiment, which would require separate NEPA and HEPA analysis, as applicable; therefore, no additional information is provided.</p>
<p>Ryan Kanaka'ole (Kathryn E. Stanaway, Acting Wildlife Program Manager - DOFAW)</p>	<p>Hawai'i State, Department of Land and Natural Resources</p>	<p>The State listed 'io or Hawaiian Hawk (<i>Buteo solitarius</i>) may occur in the project vicinity. Prior to undertaking vegetation clearing, DOFAW recommends that surveys of the area be conducted by a qualified biologist following appropriate survey methods (Gorressen et al., 2008) to ensure no 'io nests are present, which may occur during the breeding season from March to September. The survey should be conducted at least 10 days prior to the start of work. If an 'io nest is detected, a buffer zone of 100 meters (330 feet) should be established around it where no work shall occur until the chick or chicks have fledged, or the nest is abandoned and DOFAW staff should be immediately notified. If adult individuals are detected in the area, all activities within 30 meters (100 feet) of the bird should cease. Work may continue when the bird has left the area on its own.</p>	<p>Over the 2022-2023 U.S. Army Garrison PTA Natural Resources Program reporting period NRP staff conducted avian surveys on 15 transects, including 8 on State-owned land. When projects are planned for areas in suitable Hawaiian short-eared owl habitat, PTA Natural Resources staff survey project sites for ground nesting birds and MBTA-protected species prior to vegetation disturbance and project implementation. Section 3.3.4.4 and Appendix K have been updated with additional information.</p>
<p>Ryan Kanaka'ole (Kathryn E. Stanaway, Acting Wildlife Program Manager - DOFAW)</p>	<p>Hawai'i State, Department of Land and Natural Resources</p>	<p>The project area is within the range of the State listed Blackburn's Sphinx Moth (<i>Manduca blackburni</i>) or BSM. Larvae of BSM feed on many nonnative hostplants, which includes tree tobacco (<i>Nicotiana glauca</i>), that grow in disturbed soil. We recommend contacting the Hawai'i Island Branch DOFAW office at (808) 974-4221 for further information about where BSM may be present and whether a vegetation survey should be conducted to determine the presence of plants preferred by BSM. DOFAW recommends removing plants less than one meter in height or during the dry season to avoid harm to BSM. If you intend to either remove tree tobacco over one</p>	<p>No Blackburn's sphinx moths sightings on State-owned land were reported over the 2022-2023 U.S. Army Garrison PTA Natural Resources Program reporting period.</p> <p>Mitigation measures the Army would consider include: (1) a multi-year research project to identify possible biological controls in the native range of <i>C. setaceus</i> (fountain grass); (2) installation invertebrate surveys; (3) an ungulate impact assessment; (4) negotiation of an agreement with the State to monitor wildfires on land not retained; and (5) implementation of additional</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		meter in height or to disturb the ground around or within several meters of these plants, they must be thoroughly inspected by a qualified entomologist for the presence of BSM eggs and larvae.	<p>thermal technology. These mitigation measures have been added to the Mitigation Measures subsection.</p> <p>Sections 3.3.4.4 and 3.3.6 and Appendix K have been updated with additional information.</p>
Ryan Kanaka'ole (Kathryn E. Stanaway, Acting Wildlife Program Manager - DOFAW)	Hawai'i State, Department of Land and Natural Resources	There have been up to 326 native plant species documented at PTA; there are 20 native plants species that are federally and State-listed at PTA: 19 endangered and 1 threatened species. Of the 20 listed plant species, 6 species have been documented only on PTA, and 11 species (including 3 that have been documented only on PTA) have been documented on the State-owned land at PTA and are clustered in portions of the western and southern TMKs. DOFAW recommends that the Army conduct a present-day botanical survey with a qualified botanist, as well as consult with DOFAW botanists (808) 587-0166 to ensure that activities that could result in take of these species are avoided. We recommend that the survey consists of a complete species list and is conducted during the wettest time of year when plants are more likely to be visible, especially in drier areas. For information on avoidance and minimization measures for plants, please refer to the following link: <a href="https://www.fws.gov/media/plant-avoidance-and-minimization-measures-may-2023">https://www.fws.gov/media/plant-avoidance-and-minimization-measures-may-2023</a>	Sections 3.3.4 and 3.3.6 have been updated with more recent scientific data and surveys. The Army would consider: (1) a multi-year research project to identify possible biological controls in the native range of C. setaceus (fountain grass) and (2) an ungulate impact assessment as mitigation measures.
Ryan Kanaka'ole (Kathryn E. Stanaway, Acting Wildlife Program Manager - DOFAW)	Hawai'i State, Department of Land and Natural Resources	DOFAW is concerned about impacts to vulnerable birds from nonnative predators such as cats, rodents, and mongooses. We recommend taking action to minimize predator presence; remove cats, place bait stations for rodents and mongoose, and provide covered trash receptacles. In addition, no feeding of feral cats should occur on the premises.	<p>PTA actively controls small mammal predator control (cat, mongoose, and rodents) to decrease depredation pressure using live and A24 traps. Over the 2022-2023 U.S. Army Garrison PTA Natural Resources Program reporting period 252 predators were controlled.</p> <p>The Army Natural Resources staff briefs military unit leadership at the pre-deployment session to instruct soldiers not to feed feral cats and to pick up all food trash to minimize vermin.</p> <p>Section 3.3.4.2 has been revised to reflect updated information.</p>
Ryan Kanaka'ole(David)	Hawai'i State, Department of	Alternative 2 or Alternative 3 would allow for better public and resource management access in the area. Under	Sections 2.2.2, 2.2.3, and 2.2.4 revised to note that the Army assumes the State would add the State-owned land

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
G. Smith, Administrator - DOFAW)	Land and Natural Resources	Alternative 2, all leased land north of Daniel K. Inouye Highway (DKI) (a total of 3,300 acres) would be excluded from the lease renewal, returned to DLNR, and added to the Mauna Kea Forest Reserve and Kaohe Game Management Area (GMA). The PTA water tanks north of DKI should be carved out and retained by PTA. This will allow access to the forest reserve and game management area from DKI. Currently, the gates are locked from DKI. This will allow for access for cultural use, hunting, recreation, and federally mandated sheep and goat removal.	not retained that is north of DKI Highway (except for DHHL-administered land) to the Mauna Kea Forest Reserve and Kaohe Game Management Area for Alternatives 2 and 3 and the No Action Alternative. Discussion and impacts text added to Sections 3.2, 3.3, 3.4, and 3.16, as applicable. Alternatives 1, 2, and 3 include retention of PTA's water tanks (see Figures 2-2 through 2-4).
Ryan Kanaka'ole (David G. Smith, Administrator - DOFAW)	Hawai'i State, Department of Land and Natural Resources	Alternative 3, which excludes training areas 1, 2, 10, 11, 16, 17, 19, 20, 21, and 22 from the lease, for a total of 12,900 acres would provide the above access and activities, and would further provide additional lands for management of native species and ecosystems, including Threatened and Endangered (T&E) species, forest management, cultural use, and forest and outdoor recreation, including public hunting. There may be additional areas not included in Alternative 3 that would provide additional opportunities to protect and manage natural, cultural, and recreational resources if they were included in this alternative. This should be further discussed with DLNR/DOFAW.	Alternative 3 is the minimum land retention area to meet the Army's purpose and need; however, the request to include additional lands will be considered in decision making.  Potential impacts of the action alternatives on cultural resources, hunting, recreation, sheep and goat removal, and biological resources are provided in Chapter 3. Additional impacts text added to Chapter 3 where applicable.
Ryan Kanaka'ole (David G. Smith, Administrator - DOFAW)	Hawai'i State, Department of Land and Natural Resources	All lands that are to be excluded from the lease renewal must be swept for UXO and other hazardous materials and these hazards removed prior to returning the lands to DLNR in accordance with the lease.	In accordance with the lease and under the provisions of existing law, the Army retains responsibility for cleanup of closed ranges (i.e., State-owned land not retained). After the current lease expires, the Army would follow federal law and regulations to determine how and when cleanup and restoration activities for hazardous substances and MEC within the State-owned land not retained would occur under the CERCLA process.  Text added to Section 2.1 to state that the Army would follow the CERCLA process in accordance with applicable DoD and Army regulations and processes. The CERCLA process includes phases including preliminary assessment/site inspection, remedial investigation/feasibility study, remedial design/remedial action, and post-construction completion phases.

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
Capt. Brian Prudencio	County of Hawai'i Police Department	Staff, upon reviewing the documents available, does not anticipate any significant impact to traffic and/or public safety concerns.	Please see General Response 1.
Melodie Aduja	Environmental Caucus of the Democratic Party of Hawaii	There are 25 hazardous sites at the PTA. Many of these sites have been declared "clean" by the DOD but are still not safe for use by people. This military installation is safe only with the following conditions in place: erecting fences, signs, local use ordinances, prohibit or otherwise manage excavation, prohibit residential use, impose landfill restrictions, prohibit activities that would impact the landfill cap (or cover system), and drainage systems, landfill restriction - prohibit excavation on landfill cap or cover systems, landfill restriction, and/or restrict access to the site. Currently, the PTA has one HIGH-RISK active site where cleanup remains ongoing. The Pu'u Pa'a site is of high risk and is subject to the removal of unexploded munitions and ordnance at an estimated cost of \$90 million plus expected future cost of cleanup and an expected final cleanup action to occur in November 2045. The high-risk assessment is made by the DOD which prioritizes the cleanup of sites that pose greatest threat to safety, human health, and the environment. A second site subject to removal of unexploded munitions and ordnance is located at the former Bazooka Range. Its cleanup cost in 2015 plus future cost of cleanup was expected to be \$1.7 million with a final cleanup action in June 2017.	<p>Section 3.5.4.11 provides information regarding the 2015 active range management activities regarding MEC and lack of chemicals of concern at the PTA Former Bazooka Range, which includes the High Mortar Concentration Area. The text includes MEC and debris quantities from the Final Site Specific Final Report, Removal Action, Pohakuloa Training Area Former Bazooka Range, Island of Hawaii (February 2016).</p> <p>There are currently land use controls and long-term monitoring actions in place for the landfill that will remain in place even if the land is not retained by the Army. Sections 3.5.6.4, 3.8.6.4, and 3.15.6.4 state the Army would maintain ongoing management of the POTA-06 former landfill on State-owned land if the No Action Alternative is selected, pending an agreement allowing the Army access for necessary inspection and management. When the lease expires, maintenance of the landfill and land use controls may be negotiated in the transfer of the property.</p> <p>The Pu'u Pa'a site is not on PTA and is outside the scope of the EIS.</p>
Melodie Aduja	Environmental Caucus of the Democratic Party of Hawaii	The Army Training Land Retention area at PTA is not in compliance with the National Environmental Policy Act of 1969 ("NEPA"), 42 U.S.C. § 4321. Some purposes of NEPA are to declare a national policy that will encourage productive and enjoyable harmony between man and his environment; to promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man; to enrich the understanding of the ecological systems and natural resources important to the Nation; and to establish a Council on Environmental Quality. Clearly, the continuous acts of maintaining (1) live-fire and non-live-fire artillery firing points; (2) ranges for mounted, dismounted, and aviation training; and (3) support facilities, including	The Army recognizes the broad principles set out in NEPA Section 101. The statute also recognizes that federal agencies may sometimes act in ways that have adverse environmental impacts and therefore must prepare NEPA analysis.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		ammunition storage areas and helicopter and tilt-rotor aircraft landing zones fail to encourage productive and enjoyable harmony between humanity and our environment as the environment suffers irreparable harm; fails to promote efforts that prevents or eliminates damage to the environment and biosphere as the target areas remain littered with spent munitions and fragments and unexploded ordnance, contaminated with depleted uranium which fails to stimulate the health and welfare of man; and it fails to enrich the understanding of the rare ecological systems and natural resources and wildlife important to the Nation.	
Melodie Aduja	Environmental Caucus of the Democratic Party of Hawaii	Environmental Impacts. The PTA is home to one of the world’s rarest ecosystems: a tropical sub-alpine, and dryland ecosystem. The Army’s Natural Resources staff identify, manage, and protect 15 threatened and endangered plant species while maintaining a cultivation and planting program. If the Army were to own these training areas in fee simple, there could be significant environmental impacts. The Army’s land retention efforts would need to comply with both the Hawai’i Environmental Policy Act (HEPA) and the National Environmental Policy Act (NEPA), including the publication of draft environmental impact statements. However, even with these safeguards in place, there is still a substantial risk of continued, unresolved environmental damage.	Please see General Response 1.
Melodie Aduja	Environmental Caucus of the Democratic Party of Hawaii	There are several other reasons why the State of Hawai’i would not want to accept a potential land exchange with the Army for Pōhakuloa Training Area and O’ahu Training Areas. These include cultural, historical, and, as previously mentioned supra, environmental impacts. Cultural Impacts: The PTA is home to more than 300 state-registered archaeological sites. Native Hawaiian have been present in the area as far back as the 1400s – 1600s, leaving behind cultural shrines, habitation caves, burial sites, and pictographs. If the Army were to own these training areas in fee simple, there could be significant impacts on these cultural resources. While these impacts can be mitigated through appropriate consultation with Native Hawaiians and/or other interested groups, there is	EIS Section 3.4.6 provides analysis of the Proposed Action, including retention via fee simple title, on historic and cultural resources.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>still a risk of damage or loss of these important cultural sites. Historical Impacts: The PTA has a long history, having been used for military training since World War II. It has helped Army, Marine, Air Force, and Navy units maintain their combat readiness and prepare for war. If the Army were to own these training areas in fee simple, it could potentially impact the historical significance of these lands.</p>	
Melodie Aduja	Environmental Caucus of the Democratic Caucus	<p>There are 25 hazardous sites at the PTA. Many of these sites have been declared “clean” by the DOD but are still not safe for use by people. This military installation is safe only with the following conditions in place: erecting fences, signs, local use ordinances, prohibit or otherwise manage excavation, prohibit residential use, impose landfill restrictions, prohibit activities that would impact the landfill cap (or cover system), and drainage systems, landfill restriction - prohibit excavation on landfill cap or cover systems, landfill restriction, and/or restrict access to the site. Currently, the PTA has one HIGH-RISK active site where cleanup remains ongoing. The Pu’u Pa’a site is of high risk and is subject to the removal of unexploded munitions and ordnance at an estimated cost of \$90 million plus expected future cost of cleanup and an expected final cleanup action to occur in November 2045. The high-risk assessment is made by the DOD which prioritizes the cleanup of sites that pose greatest threat to safety, human health, and the environment. A second site subject to removal of unexploded munitions and ordnance is located at the former Bazooka Range. Its cleanup cost in 2015 plus future cost of cleanup was expected to be \$1.7 million with a final cleanup action in June 2017.</p>	<p>Section 3.5.4.11 provides information regarding the 2015 active range management activities regarding MEC and lack of chemicals of concern at the PTA Former Bazooka Range, which includes the High Mortar Concentration Area. The text includes MEC and debris quantities from the Final Site Specific Final Report, Removal Action, Pohakuloa Training Area Former Bazooka Range, Island of Hawaii (February 2016). There are currently land use controls and long-term monitoring actions in place for the landfill that will remain in place even if the land is not retained by the Army. Sections 3.5.6.4, 3.8.6.4, and 3.15.6.4 state the Army would maintain ongoing management of the POTA-06 former landfill on State-owned land if the No Action Alternative is selected, pending an agreement allowing the Army access for necessary inspection and management. When the lease expires, maintenance of the landfill and land use controls may be negotiated in the transfer of the property. The Pu'u Pa'a site is not on PTA and is outside the scope of the EIS.</p>
Melodie Aduja	Environmental Caucus of the Democratic Caucus	<p>The Army Training Land Retention area at PTA is not in compliance with the National Environmental Policy Act of 1969 (“NEPA”), 42 U.S.C. § 4321. Some purposes of NEPA are to declare a national policy that will encourage productive and enjoyable harmony between man and his environment; to promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man; to enrich the understanding of the ecological systems and natural</p>	<p>The Army recognizes the broad principles set out in NEPA Section 101. The statute also recognizes that federal agencies may sometimes act in ways that have adverse environmental impacts and therefore must prepare NEPA analysis.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>resources important to the Nation; and to establish a Council on Environmental Quality. Clearly, the continuous acts of maintaining (1) live-fire and non-live-fire artillery firing points; (2) ranges for mounted, dismounted, and aviation training; and (3) support facilities, including ammunition storage areas and helicopter and tilt-rotor aircraft landing zones fail to encourage productive and enjoyable harmony between humanity and our environment as the environment suffers irreparable harm; fails to promote efforts that prevents or eliminates damage to the environment and biosphere as the target areas remain littered with spent munitions and fragments and unexploded ordnance, contaminated with depleted uranium which fails to stimulate the health and welfare of man; and it fails to enrich the understanding of the rare ecological systems and natural resources and wildlife important to the Nation.</p>	
Melodie Aduja	Environmental Caucus of the Democratic Caucus	<p>Cultural Impacts: The PTA is home to more than 300 state-registered archaeological sites. Native Hawaiian have been present in the area as far back as the 1400s – 1600s, leaving behind cultural shrines, habitation caves, burial sites, and pictographs. If the Army were to own these training areas in fee simple, there could be significant impacts on these cultural resources. While these impacts can be mitigated through appropriate consultation with Native Hawaiians and/or other interested groups, there is still a risk of damage or loss of these important cultural sites. Historical Impacts: The PTA has a long history, having been used for military training since World War II. It has helped Army, Marine, Air Force, and Navy units maintain their combat readiness and prepare for war. If the Army were to own these training areas in fee simple, it could potentially impact the historical significance of these lands.</p>	<p>EIS Section 3.4.6 provides analysis of the Proposed Action, including retention via fee simple title, on historic and cultural resources. Section 4.4 provides an analysis of the cumulative impacts on historic and cultural resources and cultural practices.</p>
Melodie Aduja	Environmental Caucus of the Democratic Caucus	<p>The PTA is home to one of the world’s rarest ecosystems: a tropical sub-alpine, and dryland ecosystem. The Army’s Natural Resources staff identify, manage, and protect 15 threatened and endangered plant species while maintaining a cultivation and planting program. If the Army were to own these training areas in fee simple, there</p>	<p>Section 3.3 includes the regulatory framework applicable to mitigation efforts to ensure biological resource conservation.</p> <p>As noted in Chapter 1, this document is both NEPA and</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>could be significant environmental impacts. The Army’s land retention efforts would need to comply with both the Hawai’i Environmental Policy Act (HEPA) and the National Environmental Policy Act (NEPA), including the publication of draft environmental impact statements. However, even with these safeguards in place, there is still a substantial risk of continued, unresolved environmental damage.</p>	<p>HEPA compliant. The method of retention will be determined after the Record of Decision.</p>
Melodie Aduja	Environmental Caucus of the Democratic Caucus	<p>Aloha, Mr. Foster and Members of the U.S. Army Garrison-Hawai’i &amp; U.S. Army Installation Management Command; Members of the U.S. Army Garrison-Hawai’i Directorate of Public Works – Environmental Division, and Mr. Overton and Members of the G70:</p> <p>Thank you for the opportunity for the Environmental Caucus of the Democratic Party of Hawaii (“DPH”) to provide comments relating to the United States Army training land retention efforts for the Pōhakuloa Training Area on the Island of Hawaii.</p> <p>The Pōhakuloa Training Area (PTA) on Hawai’i Island encompasses approximately 132,000 acres of U.S. Government-owned and State-owned land. The U.S. Government leases approximately 23,000 acres from the State of Hawai’i. The lease expires on August 16, 2029. The Army proposes to retain up to 22,750 acres of State-owned land in support of continued military training. The retention will preserve maneuver area, provide austere environment training, enable access between major parcels of U.S. Government-owned land, retain infrastructure investments, allow for future modernization, and maximize use of the impact area. Loss of this land would impact the ability of the Army to meet training requirements and its mission of readiness. The Proposed Action is a real estate action that would enable continuation of ongoing activities. It does not include construction or changes in ongoing activities.</p>	<p>Please see General Response 1.</p>
Melodie Aduja	Environmental Caucus of the Democratic Caucus	<p>The Democratic Party of Hawaii has an enrolled membership of over 120,000 active and associate members in the State of Hawaii. The Environmental Caucus of the Democratic Party is a semi-autonomous</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>organization of over 7,500 DPH members. We advocate to advance the Party’s environmental Platform planks and Resolutions, including those adopted by DPH members at the Democratic State Conventions as quoted below. Fundamentally, we object to the proposed land exchange in fee simple or renewal of the lease of 22,971 acres of stolen, ceded State lands (Hawaii Revised Statutes (“HRS”) §343-5(a)(1)) in a Conservation District (HRS §343-5(a)(2)) and county Forest Reserve that was entered into between the Army and the State of Hawai’i in 1964 for an entirely unreasonable and oppressive consideration of \$1.00 for a 65-year lease to expire in 2029. For multiple reasons summarized here, we object to the proposed land exchange and/or continuation of the lease and the continued failure of the Army to adequately clean up the site.</p>	
Melodie Aduja	Environmental Caucus of the Democratic Caucus	<p>The reasons for this opposition are simple: the U.S. Military has historically and systematically abused and degraded the environment and has not been environmentally sound in its clean-up and restoration. There are more than 40,000 hazardous sites across the country polluted by U.S. military operations, affecting a total amount of land larger than the entire state of Florida. Many of these sites have extensive groundwater and soil pollution, or present a risk of exploding bombs and munitions, even if they are open to the public. Some have been converted to parks and wildlife reserves and even housing developments. Many sites were part of old defense facilities that have long since shut down, and may not be known locally, even though a risk of exposure to contaminants may still be present. Even sites where the DOD says it has already completed its response can present an ongoing threat or risk to the public. While the data may pinpoint a precise location, contamination from that location may well affect a much larger area, including public and private lands and the water supplies beneath them. See, e.g.,</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p><a href="https://www.propublica.org/article/reporting-recipe-bombs-in-your-backyard">https://www.propublica.org/article/reporting-recipe-bombs-in-your-backyard</a> (2017)</p>	
Melodie Aduja	Environmental Caucus of the Democratic Caucus	<p>The other 23 inactive sites are: (1) Humu’ula Sheep Station – West Training and Maneuver Area (explosives and munitions cleanup, restricted access, 2012); (2) Landfill 2 (WSC#7) (hazardous substances cleanup, restricted access, 1997); (3) PBA@MMRP Pōhakuloa (explosives and munitions cleanup, restricted access, 2008); (4) former FFTA PIT (WSC#11) Fire/crash Training Area (hazardous substances cleanup, restricted access, 1997); (5) former STG Area behind Building T-31 (WSC#12) spill site area (hazardous substances cleanup, restricted access, 1997); (6) Artillery Firing Area Powder Burn (hazardous substances cleanup, restricted access, 1994); (7) Impact Area (WSC#1) Unexploded munitions and ordnance area (hazardous substances cleanup, restricted access, 1990); (8) POL Storage Area (WSC#3) Spill Site Area (hazardous substances cleanup, restricted access, 1995); (9) Underground Storage Tanks Sites (7) (WSC#4) (hazardous substances cleanup, restricted access, 1990); (10) Maintenance Area (WSC#5) Spill Site Area (hazardous substances cleanup, restricted access, 1995); (11) Ammunition STG Magazines (8) (WSC#8) Spill Site Area (hazardous substances cleanup, restricted access, 1990); (12) Foam Storage Shed (WSC#9) Spill Site Area (hazardous substances cleanup, 1990); (13) Underground Storage Tanks Site (WSC#10) (hazardous substances cleanup, restricted access, 1990); (14) Former Transformer STG Area (WSC#13) Spill Site Area (hazardous substances cleanup, 1995); (15) 43 Septic tanks/12 Leach Wells (WSC#15) Surface Disposal Area (hazardous substances cleanup, restricted access, 1990); (16) Underground Storage Tanks Bldg 186 (hazardous substances cleanup, restricted access, 1994); (17) Vehicle Refueling Area Maintenance Yard (hazardous substances cleanup, restricted access, 1997); (18) Equipment Storage Area (hazardous substances cleanup, restricted access, 1996); (19) Abandoned Landfill 1 (WSC#6) (hazardous substances cleanup, restricted access, 1997); (20) Humu’ula Sheep Station-East Unexploded Munitions and Ordnance Area</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>(Explosives and Munitions, restricted access, 2006); (21) Bradshaw Field Storage Area (WSC#2) Spill Site Area (hazardous substances cleanup, restricted access, 1995); (22) Kulani Burn Pile Burn Area (Explosives and munitions, no access, 2013); (23) Kulani Boys' Home Unexploded Munitions and Ordnance Area (Explosives and munitions, no access, 2012).</p>	
Melodie Aduja	Environmental Caucus of the Democratic Caucus	<p>Given the U.S. Military's use of hazardous substances, explosives, and ordnance necessitating numerous cleanups leaving the land with restricted or no access available, it appears that the purpose of NEPA cannot be accomplished by the continuation of military training at Pōhakuloa as the land can never be restored and enjoyed even after thirty years of cleanup.</p> <p>PTA is not the only site subject to hazardous substances, explosives, and ordnance necessitating numerous cleanups. In fact, there are 115 Military Installations with hazardous sites in the State of Hawai'i, with a total past and future cleanup cost of \$2.77B. Of the 115 Military Installations, 43 are determined by the DOD to be HIGH and MEDIUM hazardous risk Installations. See the chart below:</p> <p>The point of providing this listing is to demonstrate the absolutely terrible record of the U.S. military in exercising its stewardship responsibilities as a lessee of lands in the State of Hawai'i. Given the multitude of Military Installations throughout the State of Hawai'i that remain high and medium risk of injury and contamination, the Environmental Caucus of the Democratic Party of Hawai'i remains steadfast in its opposition to the proposed retention of the PTA for the continuation of uninterrupted military training. Our objections are based on NEPA, the Public Trust Doctrine as set out in Article XI, Section 1 of the Hawai'i State Constitution, the Precautionary Principle, and as supported in <i>Ching v. Case</i>, 145 Hawai'i 148, 449 P.3d 1146 (2019).</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
Melodie Aduja	Environmental Caucus of the Democratic Caucus	<p>The Hawai'i State Constitution, Article XI, Section 1, states:"For the benefit of present and future generations, the State and its political subdivisions shall conserve and protect Hawai'i's natural beauty and all natural resources, including land, water, air, minerals, and energy sources, and shall promote the development and utilization of these resources in a manner consistent with their conservation and in furtherance of the self-sufficiency of the State. All public natural resources are held in trust by the State for the benefit of the people."The Hawai'i Supreme Court has declared that this section makes the Public Trust Doctrine ("PTD") a fundamental element of Constitutional Law in the State of Hawai'i. Specifically, under Article XI, Section 1, of the Hawai'i State Constitution, the State has an obligation to protect, control, and regulate the use of Hawai'i's water resources for the benefit of its people. The Hawai'i Supreme Court has declared that this Constitutional provision created a duty for the State to protect public trust purposes. The Public Trust Doctrine, therefore, seeks to protect the following Public Trust purposes:1. Domestic water use of the general public, particularly drinking water.2. The exercise of Native Hawaiian and traditional and customary rights, including appurtenant rights.3. Reservations of water for Hawaiian Home Land allotments.4. Maintenance of waters in their natural state. (Water Resource Protection Plan (2008), Commission on Water Resource Management)</p>	Please see General Response 1.
Melodie Aduja	Environmental Caucus of the Democratic Caucus	<p>Both the Hawai'i Supreme Court and the Commission on Water Resource Management have declared that the Public Trust Doctrine applies with equal force to groundwater as it does to surface water. The Precautionary Principle is a duty under the Public Trust Doctrine. The PTD is a preventive doctrine, not a remedial one, as the Hawai'i Supreme Court recognized when it found that the Precautionary Principle is an inherent attribute of the PTD. In endorsing the Precautionary Principle, the Hawai'i Supreme Court rejected the requirement of scientific certainty before acting to protect</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		Public Trust Purposes, noting that to do so will often allow for only reactive, not preventive regulation.	
Melodie Aduja	Environmental Caucus of the Democratic Caucus	<p>In 2018, the Democratic Party of Hawai‘i, out of concern and an abundance of caution over military degradation, devastation, and desecration of the State’s Public Trust lands, affecting hundreds of thousands of Kanaka Maoli (Native Hawaiian), residents, businesses, and visitors to the State of Hawai‘i, adopted the following Resolution:GOV:2018-18 Urging the Congressional Delegation to Actively Work to Ensure that the Military Protects Our Natural ResourcesWhereas, damaging the land and impairing natural resources is inconsistent with protecting the homeland; andWhereas, military activities have contaminated our groundwater at Red Hill, littered the landscape of Pōhakuloa with unexploded ordnance, adversely affected archaeological sites and habitat at Mākua, and rendered substantial portions of Kaho‘olawe unsafe; andWhereas, the military once claimed that it was a matter of national security that it be allowed to continue to bomb Kaho‘olawe and continue to train at Mākua, but that has proven to be inaccurate; andWhereas, a state judge questioned the Army’s veracity and reliability when it claimed to regularly clean up debris after each training exercise at Pōhakuloa; andWhereas, although the Navy argues that its fuel has not found its way into our drinking water wells, yet it is undisputed that leaks from some of its Red Hill tanks have contaminated our groundwater in an unacceptable manner; now, therefore, be itResolved, that the Democratic Party of Hawai‘i urge all members of the Hawai‘i Congressional Delegation to actively work to ensure that the military takes all necessary action to prevent degradation of our natural resources and clean up the existing contamination; and be itOrdered, that copies of this Resolution be transmitted to the Hawai‘i Congressional delegation.</p>	Please see General Response 1.
Melodie Aduja	Environmental Caucus of the Democratic Caucus	For these reasons, the Environmental Caucus of the Democratic Party of Hawai‘i opposes the proposed land swap or renewal of the 65-year lease for PTA between the U.S. Army and DLNR. The Army Training Land Retention area at PTA is not in compliance with the National	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>Environmental Policy Act of 1969 (“NEPA”), 42 U.S.C. § 4321. Some purposes of NEPA are to declare a national policy that will encourage productive and enjoyable harmony between man and his environment; to promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man; to enrich the understanding of the ecological systems and natural resources important to the Nation; and to establish a Council on Environmental Quality.</p>	
Melodie Aduja	Environmental Caucus of the Democratic Caucus	<p>The environmental damages from the continued military training use at PTA are substantial. We continue to oppose further retention of the PTA by the DOD as the risk of damage to the environment and ecosystem is great and the likelihood of restoration is low, to the detriment of the Native Hawaiian community, the community at large, and indigenous plants and animals.</p>	Please see General Response 1.
Kamuela Akeo		<p>Military spending affects our governments' ability to regulate itself and address concerns like national debt. While indirectly associated, it seems that a lava field in the middle of nowhere only benefits the private military contractors, and that the army could focus on training and innovating for the needs of the future. I agree with the army's finding of the land being "austere" but how is that relevant to live firing drills or maneuvering. There are plenty of austere environments on the american continent that are extremely distant from population. Further, this land is near Hawaiian Homes land. The state has an area that in some place is zoned as residential and then is zone for the military's use. I find this ironic at the least and dangerous at the worst. Obviously the state has neglected it's responsibility to Native Hawaiian and thus a decision to renew the lease will be meet with a civil reaction. This land is sacred. Please protect honor the 1st and 4th amendment. The land is occupied. Enforce the laws of the occupied state until a legitimate treaty of annexation is signed in place of the joint resolution Resolution 259, 55th Congress, 2nd session.</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Committer	Submitted By	Comment	Response
<p>Sherlyn Kahanuloeomakana Akiona</p>		<p>Aloha ahiahi, my name's Sherlyn Kahanuloeomakana Akiona and I am affiliated with no group other than the protect Mauna Kea group. I strongly oppose the military's ability to have the land for the Pōhakuloa training camp, as its current history is not in good standing or in alignment with the values of the native and indigenous people, I being one of them. So very strongly towards this issue, and would greatly appreciate the consideration of the Board in hearing the voices of the native people first, although we do appreciate all of the service members and the sacrifices that they make, we gravely paid for the same consideration in having our human rights as a native people considered before you know, ahead of their agenda. So that is my mana'o, and thank you for your time. Aloha ahiahi this is Sherlyn Kahanuloeomakana Akiona again, please add this editorial to my original note.</p>	<p>Please see General Response 1.</p>
<p>Sherlyn Kahanuloeomakana Akiona</p>		<p>And I feel the military needs to consider that as a factor as well given that it impacts their service members, the people that they swear to train to the best of their ability and to protect. I mean, I figure that's what the military is, is a company that looks after its own. But when it is condoning the harm and degradation of the environment that some of those service members are supposed to be protecting, it can cause great psychological impact. I would also like for the board to consider the fact that with the increased activity on Pōhakuloa and the recent lava flows. It's just not wise for a military bombing to continue being a practice there. If there are any other sorts of practices that the military would consider with the exclusion of using any sort of explosives, maybe there's a middle ground to discuss some alternatives for the military, as they phase out their use of Pōhakuloa. Again, I want to reiterate that I do not support the renewal of the military lease with all of the technology that's being developed and currently being innovated. I don't see why the military wouldn't invest more in tech practices, with AI being so accurate and lifelike, they can program simulations and practice their bombing and firing in another fashion that doesn't harm the environment. We are a small volcanic island in the middle of the Pacific</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>Ocean. There will not be much of Hawai'i left if Pōhakuloa is given back to the military. And I am recording my statement so that I can share it on my platforms as well to ensure that my point of view is heard. Mahalo.</p>	
<p>Sherlyn Kahanuloeomak ana Akiona</p>		<p>I think it's very poignant to view the impact environmentally that the military has had on the Pōhakuloa training camp specifically with their use of white phosphorus in their training practices. It's very toxic to the environment, and therefore will greatly impact our aquifer, our natural aquifer. In fact, it will contaminate it to the point where it is not able to feed the land, and therefore its people. This in turn, will cause a major strain within the indigenous community, as many of your service members happen to be of Native Hawaiian descent, and that conflict in their complicity with their practices, and how it harms the very kuleana that we as kanaka are sworn to protect can cause a lot of psychological, negative psychological impacts.</p>	<p>Sections 3.5.4.11 and 3.5.4.12 describe the lack of mobilization of munitions constituents, including white phosphorus, within soil, groundwater, and surface water. Section 3.5.4.11 indicates that white phosphorus is a munitions constituent commonly released from many obscurants. The text notes that risk of contaminants mobilizing is not a concern as limited surface water and groundwater pathways on the State-owned land pose minor potential impact to soil and groundwater quality.</p> <p>The best available scientific data for groundwater and surface water quality was incorporated into this EIS. Section 3.9.4.6 documents the existing management measures used by the Army to protect water resources. The State Department of Health (DOH) Safe Drinking Water Branch (SDWB) monitors groundwater quality of aquifers as described in Section 3.9. The DOH SDWB has released groundwater contamination maps for Hawai'i Island that show most contamination is along the eastern coast of the island. The DOH SDWB Environmental Health Portal is available at <a href="https://eha-cloud.doh.hawaii.gov/sdwb/#!/home">https://eha-cloud.doh.hawaii.gov/sdwb/#!/home</a>.</p>
<p>James Albertini</p>	<p>Malu 'Aina</p>	<p>7. What are the current number of live-rounds, and listing of all the various types of rounds, fired at PTA? Is it 15 million, 20 million, 25 million? The last figure I believe released about 20 years ago noted 14.8 million live rounds fired annually at PTA. What other rounds, besides live rounds, have been fired at PTA?</p> <p>Jim Albertini, president of Malu 'Aina Jim Albertini Malu 'Aina Center For Non-violent Education &amp; Action P.O. Box 489 Ola'a (Kurtistown) Hawai'i 96760 Phone 808-966-7622 Email <a href="mailto:ja@malu-aina.org">ja@malu-aina.org</a> Visit us on the web at <a href="http://www.malu-aina.org">www.malu-aina.org</a></p>	<p>Text added to Sections 1.2.5 and 3.5.4.11 to note that approximately 1.7 million rounds of military munitions are fired at PTA annually, with 95 percent being small arms (9 millimeter or less) of which 10 percent are blanks. For larger munitions, (n=66,677), 79 percent (n=52,627) are inert (i.e. have no explosive component).</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
James Albertini	Malu 'Aina Center for Non-violent Education & Action	<p>2. Millions of live rounds are fired annually at Pohakuloa by the Army, Navy, Air Force, Marines, and foreign troops involving a wide range of weapon systems from dozens of firing points on land leased from the State of Hawaii. (map on p. 52 of draft2 EIS) Exactly how many firing points are on State leased land? Please list the total number of rounds fired from each of these firing points and the kinds of rounds fired. I believe nearly 20 years ago when the Stryker Brigade was based in Hawaii, the military said over 7 million live rounds were fired annually at Pohakuloa and that number would be increasing dramatically. What is the current number fired not only from leased land but onto all of Pophakuloa from air, land, and sea. It's been noted that B-52 and B-2 bombers fly non-stop bombing missions from Louissana, Missouri, and Guam to Bomb Pohakuloa. Please list all of the various types of rounds fired. We have a right to know the big picture of what's going on at PTA.</p>	<p>Table 2-1 notes that 107 of the 118 firing points at PTA are within the State-owned land, and that the firing points are used for indirect-fire weapons (i.e., artillery, mortars, and rockets).Text added to Sections 1.2.5 and 3.5.4.11 to note that approximately 1.7 million rounds of military munitions are fired at PTA annually, with 95 percent being small arms (9 millimeter or less) of which 10 percent are blanks. For larger munitions, (n=66,677), 79 percent (n=52,627) are inert (i.e. have no explosive component).</p>
Jim Albertini		<p>There's a lot of other points I'd like to make, but let me add this one. Pohakuloa is a Lahaina firestorm in the making for Hawaii Island and the danger is increasing with climate disaster. In the EIS draft 2, it states, "There have been 892," let me repeat that, "892 recorded fires attributable to military activities at PTA since 1975 according to the military. But the military also says that many fire records prior to 2012 have been lost." That's page 354 for anyone who wants to look. One year to the day of the Lahaina fire, there was a fire at Pohakuloa that wasn't named the Pohakuloa fire, it was called the Leilani fire, and it burned over 17,000 acres, including more than 12,000 acres off the base, destroying native endangered species and cultural sites. Issues of land ownership, the military needs to be reminded, time and time again, you are not good neighbors. You are not stewards of the land. You are illegal-occupying powers who participate in an illegal overthrow of Hawaii. In 1893, they've been illegally occupying. I wrote a book entitled "The Dark Side of Paradise," about the military in Hawaii. I recommend that you read that. I'll conclude with this. I recall a high-ranking German Nazi officer at the Nuremberg Trials being asked, "How many people tried to escape Auschwitz?" And he</p>	<p>Changes to climate patterns as a result of climate change are addressed in Section 3.6. As noted in Section 3.6.6, "increased potential for drought and riverine flooding at PTA from changes to regional temperature and precipitation patterns would be unlikely to preclude retention and continued military use of the State-owned land; however, the increased potential for drought may result in increased wildfires, which would adversely impact local air quality." A summary of historical fires at PTA, including the recent Leilani fire that occurred in 2022, is provided in Sections 3.3 and 3.16. The text in Section 3.16.4 has been revised with additional information on historical wildland fires that have occurred on State-owned land and a table has been added summarizing historical fires documented on State-owned land since 2012. Additional text has been added to Section 3.16 regarding increased wildfire risk as a result of climate change.</p> <p>Mitigation measures the Army would consider include (1) negotiation of an agreement with the State to monitor wildfires on land not retained and (2) implementation of additional thermal technology. These mitigation</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>said, "Well, nobody tried to escape Auschwitz. Why would they want to escape? Auschwitz is a family camp." Right? By you saying you're good neighbors and stewards of the land, you're repeating the big lie.</p>	<p>measures have been added to the Potential Mitigation Measures subsection.</p> <p>Section 3.2.4.1. discusses the events of 1893 and the Apology Resolution in 1993.</p>
<p>Jim Albertini</p>		<p>Depleted uranium is just one of many toxins that have been used up there at the 132,000 acre base for more than 75 years. DU oxide particles can be carried long distances in the wind and when inhaled can cause a wide range of cancers, birth defects, and probably the worst thing, genetic damage that can be passed to future generations. For years, the military lied saying no DU weapons were ever fired at Pohakuloa; then you were caught in the lie in 2007. And they have continued to try and downplay both the number of DU rounds fired and the potential health hazard, health risks to troops and civilians. The Army has failed to comply with Hawaii County Resolution 639-08 passed by a vote of eight to one that called for stopping all live fire at Pohakuloa and all activities that create dust until there is a comprehensive independent assessment and cleanup of the DU present at Pohakuloa. You haven't taken that action and the seven other actions that were called for in that county resolution. The county also named Dr. Lorrin Pang, MD as the official county liaison with the military. Dr. Pang spent 24 years in the Army Medical Corps and was named in the who-is-who top 3 percent of America's best doctors. The military has refused to consult with Dr. Pang.</p>	<p>Sections 3.5.4.11 and 3.5.4.12 describe the lack of mobilization of munitions constituents, including depleted uranium. Section 3.5.4.12 discusses the various studies of depleted uranium at PTA, including archival research, site reconnaissance, radiological instrumentation, soil samples, air samples, and a health and risk assessment, and notes that surveys found no indication of depleted uranium within the State-owned land.</p> <p>Sections 3.5.4.12 and 3.6.4 note: The Army completed a 1-year airborne uranium monitoring program in 2009 to determine if the decay and vaporization of DU fragments has impacted local air quality. The monitoring program collected 210 air samples from three sites upwind and downwind of PTA to provide a basis of comparison. The monitoring program concluded that the DU had not impacted air quality at PTA or in the surrounding area because the total airborne uranium levels in the collected particulate matter samples were within the range of naturally occurring uranium in Hawaiian soils and rock and were several orders of magnitude below U.S. and international chemical and radiological health guidelines.</p>
<p>Jim Albertini</p>		<p>Aloha. I'm Jim Albertini, President of Malu 'āina. I've been an organic farmer in Kurtistown for 47 years and a school teacher and a coordinator for University Peace Education project on Oahu for 10 years before that. First of all, I want to say, Colonel, you repeated the big lie in your introduction that the military is good neighbors and that you're stewards of the land. It's the same thing Lieutenant Colonel Alvarado said on the day he was brought in in the command in June of last year, "We are stewards of the land." The land at Pohakuloa is zoned state conservation land; the highest protected land status. The land may not have been zoned conservation in '64 when the lease was</p>	<p>Compliance with HAR Chapter 13-5, Conservation District, has been revised and is discussed in Sections 1.4.2 and 5.3.2. Sections 1.4.2, 3.2, and 5.3.2 have also been revised to make clear that for analysis purposes, the EIS assumes BLNR would establish a special subzone in the conservation district through a rule amendment that allows for military training use.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>first issued, but it is state conservation district now. So no lease renewal, no action alternative, no land swaps. Stop the bombing and desecration. Make the military clean up its toxic mess. Return the land to the Kānaka Maoli and pay reparations for destruction of the land and psychological injuries caused by your 75 years of bombing Pohakuloa. Millions of live rounds are fired annually at Pohakuloa by the Army, Navy, Air Force, Marines, and foreign troops. A conservation district is not for firing bombs, rockets, mortars, et cetera. How more basic can you get? Right?</p>	
Jim Albertini	Malu 'Aina	<p>PTA is a toxic waste dump, a Lahaina firestorm, and Red Hill disaster in the making. The military admits to 892 fires started at PTA attributable to military activities, averaging 37 per year according to their own data. Our position is NO lease renewal. NO land swap! Stop the bombing and clean up the massive military toxic mess. Do a much better job than was done on Kaho'olawe. Rescind the 1964 Presidential executive order that seized 84,000 acres at PTA at zero cost. That's what was done on Kaho'olawe to return the land to the Hawaiian people. That land is not "owned" by the US. It was seized. Just like the illegal overthrow of the independent Kingdom of Hawaii was illegally overthrown by US business interest with direct assistance of the US military. The US continues similar actions in many places around the world today. Jim Albertini, President of Malu 'Aina submitted April 29, 2024</p>	Please see General Response 1.
Jim Albertini	Malu 'Aina	<p>OUR ORGANIZATION ADVISES AGAINST ANY STUDENT EARTH DAY EXCURSIONS TO POHAKULOA TRAINING AREA. We believe that an independent, comprehensive study needs to be done to determine the full extent of toxic contamination at Pohakuloa from more than 75 years of live-fire bombing involving a wide range of toxins, including Depleted Uranium radiation. We call for a complete cleanup of the contamination before any further public events (such as Experience Pohakuloa Day) are held at Pohakuloa. Please be mindful of the Red Hill military contamination of groundwater wells on Oahu and</p>	<p>Students are not permitted into areas of PTA known or suspected to contain contaminated soil or MEC.</p> <p>Sections 3.5.4.11 and 3.5.4.12 describe the lack of mobilization of munitions constituents, including depleted uranium, within soil, groundwater, and surface water. The text notes that risk of contaminants mobilizing is not a concern as limited surface water and groundwater pathways on the State-owned land pose minor potential impact to soil and groundwater quality.</p> <p>The best available scientific data for groundwater and surface water quality was incorporated into this EIS.</p>

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
		<p>thousands being sickened as a result.</p> <p>Our organization, on numerous occasions, with certified radiation monitors picked up spike readings several times background levels outside of Pohakuloa, especially with winds coming from the south off the base toward Saddle Road.</p>	<p>Section 3.9.4.6 documents the existing management measures used by the Army to protect water resources. The State Department of Health (DOH) Safe Drinking Water Branch (SDWB) monitors groundwater quality of aquifers as described in Section 3.9. The DOH SDWB has released groundwater contamination maps for Hawai'i Island that show most contamination is along the eastern coast of the island. The DOH SDWB Environmental Health Portal is available at <a href="https://eha-cloud.doh.hawaii.gov/sdwb/#!/home">https://eha-cloud.doh.hawaii.gov/sdwb/#!/home</a>.</p> <p>Sections 3.5.4.12 and 3.6.4 contain a discussion on depleted uranium and the Army's 2009 air quality monitoring program, which concluded that depleted uranium had not impacted air quality at PTA or in the surrounding area.</p>
James Albertini	Malu 'Aina	<p>Written testimony to Pohakuloa EIS draft #2 concerning Pohakuloa lease.1. What possible toxins are blowing in the dust, wind, and smoke off PTA from more than 75 years of bombing and shelling, including the use of Depleted Uranium (DU) radiation rounds at PTA? It has been suggested that an independent authority install air filters 360 degrees surrounding the base at government expense to see what might be coming off the base. What is your evaluation of PTA's lack of response to Hawaii County Council's resolution 639-08 passed in July 2008 by a vote of 8-1 calling on 8 actions to be taken by PTA.</p>	<p>Sections 3.5.4.11 and 3.5.4.12 describe the lack of mobilization of munitions constituents, including depleted uranium. Sections 3.5.4.12 and 3.6.4 note: The Army completed a 1-year airborne uranium monitoring program in 2009 to determine if the decay and vaporization of DU fragments has impacted local air quality. The monitoring program collected 210 air samples from three sites upwind and downwind of PTA to provide a basis of comparison. The monitoring program concluded that the DU had not impacted air quality at PTA or in the surrounding area because the total airborne uranium levels in the collected particulate matter samples were within the range of naturally occurring uranium in Hawaiian soils and rock and were several orders of magnitude below U.S. and international chemical and radiological health guidelines.</p>
James Albertini	Malu 'Aina	<p>6. There are growing community concerns about not renewing or canceling the State lease of 23,000 acres for 65 years at a total cost of \$1 and the rescinding of the US presidential executive order in 1964 that seized 84,000 acres of Hawaiian crown and government lands indefinitely for zero costs.</p>	<p>Please see General Response 1.</p>
Jlm Albertini	Malu 'Aina	<p>Water wells were drilled more than 10 years ago at PTA more than 10 years ago but that water is not being used.</p>	<p>The best available scientific data for groundwater and surface water quality was incorporated into this EIS.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>PTA spends millions of dollars hauling water to the base. We comprehensive, independent testing of what military toxins are in those water wells that hit water at shallow depths of 700 feet below surface.</p>	<p>Groundwater and surface water quality are discussed in Section 3.9 of the EIS. Section 3.9.4.6 of the EIS documents the existing management measures utilized by the Army to protect water resources. The State Department of Health (DOH) Safe Drinking Water Branch (SDWB) monitors groundwater quality of aquifers as described in EIS Section 3.9. SDWB has released groundwater contamination maps for Hawai'i Island that show most contamination is along the eastern coast of the island. The DOH SDWB Environmental Health Portal can be accessed at <a href="https://eha-cloud.doh.hawaii.gov/sdwb/#!/home">https://eha-cloud.doh.hawaii.gov/sdwb/#!/home</a></p> <p>Section 3.5 Hazardous Substances and Hazardous Wastes presents the existing conditions from current activities at PTA and notes that risk of contaminants mobilizing is not a concern as limited surface water and groundwater pathways on State-owned land pose minor potential impact to soil and groundwater quality. Groundwater extraction from State-owned land at PTA is not proposed as part of the Proposed Action.</p> <p>Section 3.9.4.2 has been updated to include additional information from the Thomas (2019) report. A link to this report has been added to the PTA EIS website (<a href="https://home.army.mil/hawaii/ptaeis/project-home">https://home.army.mil/hawaii/ptaeis/project-home</a>) under the "Documents" tab.</p>
James Albertini	Malu 'Aina	<p>4. What are the military plans for clean up of all the Unexploded Ordnance (UXO) and other toxins on the entire 133,000- acres of PTA? I note that maps of PTA say "All of PTA should be considered a Dud Hazard Area."</p>	<p>Section 3.5.6 describes the cleanup activities to be performed on any State-owned land not retained. Cleanup of hazardous substances and MEC on the entirety of PTA is outside of the scope of this EIS.</p>
James Albertini	Malu 'Aina	<p>5. It's been reported that less than half of PTA has been surveyed for cultural sites in 75 years. Why the delay in doing cultural surveys for the entire base?</p>	<p>Section 3.4.4.6 discusses the Army's CRM Program at PTA, including the State-owned land. Previous archaeological surveys are provided in Table 3-14 of the EIS. Section 3.4.4.3 discusses why portions of State-owned land have not been surveyed.</p>
James Albertini	Malu 'Aina Center for Non-violent Education & Action	<p>5. Issue of Land ownership. According to Kanaka Maoli attorney, Poka Laenui, (Hayden Burgess) attorney, there are serious legal land ownership issues surrounding Pohakuloa and Hawaii, involving US law and international</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>law. Simply put, Hawai'i is an illegally-occupied sovereign nation under international law. The military claims the leased lands are important to connect to US government owned lands at Pohakuloa. The military claims the 758 acre Cantonment area with the main administration buildings. And also including Bradshaw air field is one area of US government owned land. The other area is the 84,000 + acre area that includes the 51,000 acre impact area and various adjacent training areas. Let's be clear: the 758 acre parcel was seized by a 1956 territorial Governor executive order (EO 1719) under territorial Gov. Samuel Wilder King. The 84,057acre parcel was seized by a 1964 Presidential Executive order (EO 11107) under US President Lyndon B. Johnson. There appears to have been no payment in either governor's nor presidential executive order seized lands. Nada. Not 1 dollar. Not 1 cent. Poka Laenui states: "Jim Albertini has republished an article regarding the lease of Pohakuloa to the U.S. military and asking for thoughts on the matter. Because the issue also applies to many other areas coming up for renewal to the U.S., and feeling that the question is of such wide importance, I am sharing my response here. Thoughts? There are two legal regimes under which this question of future Hawaii land use could fall into; the first is the American domestic law and the second is the international law under which the principles of decolonization would apply. Which is the appropriate legal regime? The American domestic law gains its advantage by denial of its own history of the aggression against Hawaii in 1893 and applying its own acts of aggression and its step by step justifications for the taking of Hawaii's sovereignty. It is successful in the buildup of its "legal case" by its self-proclaimed assertion of legitimacy and precedent, essentially bootstrapping itself, with always the silent presence of U.S. military behind it to back its conclusion. The international law legal regime has reared its head up against the American domestic law regime over the past 50 years, from a new-found awareness that we come from a history which predates Hawaii's "Statehood" and American "territorial" era, to a time of Queens and Kings</p>	

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>and of a time of proud nationhood of Hawaii. That was a time in which the Hawaiian nation stood as an equal among all other nations before the international legal regime. The United States violated the independence of Hawaii in a sneak attack upon the shores of Hawaii and, through a set of step-by-step transactions with mainly American businessmen, took over the reins of Hawaii's government. In 1945, anticipating the end of the 2nd World War, nations of the world set out to develop a "New World Order" by which international law would be respected by all nations large and small. These nations formed the United Nations, and realizing many instances of violations of basic principles of international law, set up a special place within the United Nations for areas which had its rights to self-determination violated, calling these places "non-selfgoverning territories". In somewhat of an admission of the treatment of Hawaii under U.S. regime, the U.S. submitted Hawaii as a non-selfgoverning territory entitled to exercise self-governance by being presented in the future options for self-determination. 1959 became that appointed time for the exercise of self-determination. The United States used a "statehood act" to be that tool to determine self-determination. But the U.S. cheated in the employment of self-determination for the people who were supposed to practice self-determination. The U.S. did so in the following ways. It committed an international fraud by altering the "self", the who, the people who were entitled to self-determination. Rather than the people entitled to be the "self", the Hawaiian people who were the original people who lost their identity as Hawaiian nationals by American colonization, the U.S. identified the 'self' in the 1959 referendum as only American citizens who have lived in Hawaii for at least 1 year. In switching the definition of the 'self,' the U.S. also included its military within this definition, another violation of international law for an occupying force to allow its military to join in such an exercise of self-determination. The second fraud of this "double fraud" was the U.S. limiting of choices which should cover "determination." There should have been 3 options for determination,</p>	

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>independence from the colonial power (U.S.), free association, or intergration such as becoming a "State" of the United States. The second fraud was carried out by the U.S. failing to provide other choices beside Statehood. Thus, we were simply not given the choices of independence or free association. Therefore, this act of self-determination was denied the people of Hawaii. How is this pilikia or trouble to be unraveled? There should be no action taken by the State of Hawaii or by the U.S. government to proceed under the domestic laws of the United States until the issue of the international legal question is first resolved. All land issues as well as exercise of American jurisdiction should be held in abeyance. There is now an attempt to bring this question of jurisdiction to the U.N. for clarification on this matter, and until the matter is resolved, no action should be taken by the State or the Feds to dispose of the title of Hawaii's lands." Poka Laenui, (Hayden Burgess) Attorney  <a href="http://www.hawaiianperspectives.org">www.hawaiianperspectives.org</a></p>	
James Albertini	Malu 'Aina	<p>2. There are growing concerns about spreading wildfires started at PTA from bombing and shelling. Is PTA, located in the dry, windy center of Hawaii Island, our "Lahaina" fire waiting to happen?</p>	<p>Changes to wildfire risk in response to climate change is addressed in Section 3.6. The recent Leilani fire that occurred at PTA is addressed in Sections 3.3 and 3.16. Additional text was added to Section 3.16 regarding increased wildfire risk as a result of climate change.</p> <p>Mitigation measures the Army proposes include (1) negotiation of an agreement with the State to monitor wildfires on land not retained and (2) implementation of additional thermal technology. These mitigation measures have been added to the Mitigation Measures subsection.</p>
James Albertini	Malu 'Aina Center for Non-violent Education & Action	<p>6. Our organization supports the Kanaka Maoli right to restore their independent nation before the government was illegally overthrown in 1893 by US business interest with the direct illegal assistance of the US military. We also support concerns about impacts to cultural and historic sites and practices at PTA, but we will leave it to Kanaka Maoli to address these important issues.</p>	<p>Please see General Response 1.</p>
James Albertini	Malu 'Aina	<p>3. There are growing concerns, in light of Military Red Hill fuel contamination of the the aquifer on Oahu about</p>	<p>The best available scientific data for groundwater and surface water quality was incorporated into this EIS.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>toxins from PTA possibly contaminating the drinking water of Hawaii Island. Were military toxins found in the two water wells drilled at PTA 10 years ago? Were the water wells tested for a wide range of military toxins? Why aren't those wells being used by PTA instead of paying \$2 million yearly to haul water to PTA?</p>	<p>Groundwater and surface water quality are discussed in Section 3.9 of the EIS. Section 3.9.4.6 of the EIS documents the existing management measures utilized by the Army to protect water resources. The State Department of Health (DOH) Safe Drinking Water Branch (SDWB) monitors groundwater quality of aquifers as described in EIS Section 3.9. SDWB has released groundwater contamination maps for Hawai'i Island that show most contamination is along the eastern coast of the island. The DOH SDWB Environmental Health Portal can be accessed at <a href="https://eha-cloud.doh.hawaii.gov/sdwb/#!/home">https://eha-cloud.doh.hawaii.gov/sdwb/#!/home</a>Section 3.5 Hazardous Substances and Hazardous Wastes presents the existing conditions from current activities at PTA and notes that risk of contaminants mobilizing is not a concern as limited surface water and groundwater pathways on State-owned land pose minor potential impact to soil and groundwater quality. Groundwater extraction from State-owned land at PTA is not proposed as part of the Proposed Action. Section 3.9.4.2 has been updated to include additional information from the Thomas (2019) report. A link to this report has been added to the PTA EIS website (<a href="https://home.army.mil/hawaii/ptaeis/project-home">https://home.army.mil/hawaii/ptaeis/project-home</a>) under the "Documents" tab.</p>
James Albertini	Malu 'Aina Center for Non-violent Education & Action	<p>8. I have received word that the military fox/mongoose may try to sneak its way into the hen house if blocked by current conditions. Word is the sly military fox/mongoose may seek a special district within the conservation zone, or try to change conservation land rules, or try go to the Land Use Commission to take the land out of conservation zoning. Another possibility is that the military fox/mongoose may try to change the designation of the PTA leased lands to urban, and make a gift of other Federal lands to the state. Seems like the military fox/mongoose is hard at work.</p>	<p>Please see General Response 1.</p>
James Albertini	Malu 'Aina Center for Non-violent Education & Action	<p>9. Comments not considered substantive about the EIS are put in the military trash can labeled (General Response #1). It would be like a Nuremberg Nazi war crime trial witness being asked where were the Nazi gas chambers</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>and ovens located at Auschwitz and answering that the question is not substantive because we are only dealing with leased lands and only dormitories are located on leased land at Auschwitz. Now that's a theoretical question, but I do recall a high ranking officer at Auschwitz being asked at the Nuremberg trails – How many people tried to escape at Auschwitz? He replied: "No one tried to escape.. Why would people try to escape? Auschwitz was a Family Camp." Finally, I recall the Hawaii Tribune Herald headline story about the day LTC Alvarado was sworn in as PTA Commander in June of 2023. The headline read "We are Stewards of the Land." On May 7, 2024 at the EIS Public Hearing in Hilo, Hawaii Garrison Commander Col. Col. Steve McGunegle introduced the meeting and repeated THE BIG LIE -- "We (the Army at Pohakuloa) are good neighbors and we are stewards of the land." What a way to introduce yourself to outrage the community. Reminds me of the Book written in the 1960s "The Ugly American." Jim Albertini, President of Malu 'Aina Center for Non-violent Education &amp; Action May 7, 2024 Claims of US owned lands questioned. Learning from Kaho'olawe — Stop the Bombing of Pohakuloa Published by jalbertini on October 29th, 2020 in Hawaii Independence, Military, Pohakuloa, Social Justice, Take Action!. The Conversation: Oral History of Kaho'olawe By Catherine Cruz &amp; Bill Dorman • Oct 22, 2020 (30th anniversary of the Bombing being stopped Oct. 22, 1990 on Kaho'olawe) <a href="https://www.hawaiipublicradio.org/.../conversation-oral...">https://www.hawaiipublicradio.org/.../conversation-oral...</a> Jim Albertini comments: Stop Bombing Pohakuloa just like the bombing got stopped on Kaho'olawe When Hawaii US Senator Sparky Matsunaga died, Pat Saiki ran against Dan Akaka for the US Senate seat in 1990) During one of these oral history tapes I heard on HPR (24 min mark in tape link above) about Kaho'olawe 30th anniversary) was a tape of Pat Saiki. Saiki talks about being invited by President George H.W. Bush to a meeting in the Oval Office. Saiki told Bush Hawaii was a very Democratic state so she needed something that would give her (a Republican) a boost to beat Akaka (a Democrat). Bush said what can I do. She said Kaho'olawe was a very active issue. If Bush</p>	

Responses to Second Draft EIS Comments

Commenter	Submitted By	Comment	Response
		<p>could help stop the bombing it could possibly help Saiki beat Akaka. Saiki said Bush could issue a presidential executive order to stop the bombing. Bush turned to his chief of staff –John Sununu and said "DO IT." The bombing was stopped Oct. 22, 1990. But Saiki lost to Akaka anyway though I'm sure it helped get her some votes. Today, the Bombing at Pohakuloa takes place (Not on State leased land) but on 84,000 acres seized by a presidential executive order in 1964 under LB Johnson. How do we get a new presidential executive order to Stop the bombing at Pohakuloa similar to the Bush executive order in 1990? The key thing — we need to build a Kaho'olawe style mass movement to turn up the heat on elected officials at all levels. "The military in Hawaii is out of control and having a deadly impact on the life of our lands like they did on Kaho'olawe." Walter Rittee quote recently on FB social media commenting on the US Air Force plans to build up to 7 telescopes on Haleakala, Maui. For the record, we include the videos and article listed below to underscore the destruction, desecration, and dangers of toxic contamination, including DU at PTA Learn more: See the 11-minute video — How the Army Got to Bomb Hawaii For \$1 <a href="https://youtu.be/-nsn4Sxy8r8">https://youtu.be/-nsn4Sxy8r8</a> Pohakuloa 14 min. video "Now that you Know, Do You Care?" <a href="https://vimeo.com/94598875">https://vimeo.com/94598875</a> Also the video of Dr. Lorrin Pang, M.D., public health officer, retired 24 years in the Army Medical Corps, and listed in the Who's Who (top 3%) of America's Best Doctors explaining the health dangers of inhaling DU oxide dust particles <a href="https://vimeo.com/19153948">https://vimeo.com/19153948</a>. Also read – A Brief History Of US Military Poisoning Of Hawai'i – PopularResistance.Org — Jim Albertini Malu 'Aina Center For Non-violent Education &amp; Action P.O. Box 489 Ola'a (Kurtistown) Hawai'i 96760 Phone 808-966-7622 Email <a href="mailto:ja@malu-aina.org">ja@malu-aina.org</a> Visit us on the web at <a href="http://www.malu-aina.org">www.malu-aina.org</a> list of 57 military sites on Hawaii Island Map of Military Sites on Hawaii Island</p>	
James Albertini	Malu 'Aina Center for Non-violent Education & Action	3. Depleted Uranium (DU) is just one of many toxins used at the 132,000-acre site in more than 75 years of bombing and shelling. DU oxide particles can be carried long	Section 3.5.4.12 includes information about depleted uranium and associated studies at PTA (i.e., archival research, site reconnaissance, radiological

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>distances in the wind and when inhaled can cause a wide range of cancers, birth defects, and even genetic damage passed to future generations. For years, the military lied, saying no DU weapons were ever fired at Pohakuloa. Then when caught in the lie in 2007, they have continued to try and downplay both the number of DU rounds fired and the potential health risk to troops and civilians. The Army has failed to comply with Hawaii County Resolution 639-08 passed by a vote of 8-1 that called for stopping all live fire and all activities that create dust until there is a comprehensive, independent assessment of the DU present and it is cleaned up. Other actions were called for as well. None of the actions have been carried out. The county also named Dr. Lorrin Pang, MD as the official county liaison with the military. Dr. Pang spent 24 years in the Army Medical Corps and was named in the Who's Who (top 3%) of America's Best Doctors. The military has refused to consult with Dr. Pang.</p> <p>Our organization challenges the military claims on p. 223 that "past use of DU has not impacted air quality at PTA or in the surrounding area." We also challenge the statement on p 198 that "No radioactive material has been identified on State owned land." These are classic statements of the Fox saying everything in the hen house is fine. NO problem. Our organization on numerous occasions have obtained radiation readings several times background levels with certified calibrated radiation monitors out side the PTA main gate and at Mauna Kea Park, now named the Gibert Kahele Park. Our first elevated readings several times background levels with 2 calibrated monitors was on May 29, 2007 at Mauna Kea Park for the dedication of the Daniel K. Inouye highway. This was several months before the military finally admitted that DU was used at PTA.</p> <p>Another factor is that DU spotting rounds were first used at PTA in the 1960s fired into the Impact area. That impact area has been bombed and shelled for more than 40 +years before any restriction was placed on areas contaminated by DU. Another thing, the military fox in the hen house consistently downplays the number of DU rounds fired at PTA. Army Garrison Col. Howard Killian</p>	<p>instrumentation, soil sample results, health and risk assessments). Section 3.5.4.12 states that surveys found no indication of depleted uranium-containing materials on the State-owned land.</p> <p>Sections 3.5.4.12 and 3.6.4 contain a discussion on depleted uranium and the Army's 2009 air quality monitoring program, which concluded that depleted uranium had not impacted air quality at PTA or in the surrounding area.</p>

Responses to Second Draft EIS Comments

Commenter	Submitted By	Comment	Response
		<p>testified before the Hawaii County Council in 2008 that based on the number of people trained and certified to fire the Davy Crockett nuclear weapon system at PTA, he said that 2000 DU spotting rounds were likely fired. And if the fox in the hen house lied about the actual number Davy Crockett DU spotting rounds (fox claims 400), what about possible lies about other DU spotting and DU penetrator rounds? Col. Killian testified that DU rounds were prohibited to be used in training at PTA since 1996. So what does that say about their possible use before 1996? All this underscores the need for COMPREHENSIVE INDEPENDENT TESTING AND MONITORING" that has the confidence of the community, instead of accepting the fox in the hen house statements that everything is OK on pages 218 – 223. Even the fox admits that DU rounds were fired from at least one firing point –Range 13 on TA 9 located on State leased land.</p>	
James Albertini	Malu 'Aina Center for Non-violent Education & Action	<p>6. Our organization supports the Kanaka Maoli right to restore their independent nation before the government was illegally overthrown in 1893 by US business interest with the direct illegal assistance of the US military. We also support concerns about impacts to cultural and historic sites and practices at PTA, but we will leave it to Kanaka Maoli to address these important issues. However, I want to note for the record that the Cultural Impact Assessment (CIA) in the draft #2 is deficient because it removed approx. 900 pages of informant testimony and analysis (Compare the CIA in the First DEIS vol 2 with Second DEIS vol 3). It's been also reported that the archaeological survey was not fully completed, so that is deficient as well. <del>And the wildfire analysis is deficient (the Federal firefighters at PTA are not trained or equipped for wildfire; they do airport fires)</del></p>	<p>The first draft CIA was revised to improve readability, focus analysis within the project area and broad geographical area, and add information from new survey respondents and interviews. No information provided by the interviewee and survey respondents was removed from the DEIS CIA. Section 3.4.4.6 discusses the Army's CRM Program at PTA, including the State-owned land. Previous archaeological surveys are provided in Table 3-14 of the EIS. Section 3.4.4.3 discusses why portions of State-owned land have not been surveyed.</p>
James Albertini	Malu 'Aina Center for Non-violent Education & Action	<p>7. Whatever happens mauka comes makai. Despite assurances from the fox and mongoose that everything is fine in the hen house, common sense prevails. We are all downwind, downhill of Pohakuloa. The military poisoning of military families and civilians from Red Hill jet fuel leaks into Oahu's water table is not an isolated military toxic event. Our organization put together more than 20 years</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>ago a map of Hawaii Island with 57 known present and former military sites with a vast amount of hazards. I will submit a copy for the record. Here I will simply point out one site . Around the same time the Army used DU spotting rounds at PTA, it got a lease of state lands in the Waiakea forest area (Hilo's watershed) located south of Hilo. The Army told the state it wanted to do "weather testing." The Army was lying. It tested a wide rage of chemical and biological weapons in the Hilo watershed including Sarin nerve gas that kills at 1/50 of a drop. Congresswoman Patsy Mink disclosed the Army lie. Hawaii County Mayor at the time, Sunichi Kimura, and many other people spoke up and said "The Army lied to us. Cancel the State lease." And the lease was canceled. The same needs to be done at PTA. Cancel the State lease of land to Pohakuloa here and now. And certainly don't renew the lease.</p>	
James Albertini	Malu 'Aina Center for Non-violent Education & Action	<p>Detailed testimony opposing lease renewal of State lands at the Pohakuloa Training Area May 7, 2024 Testimony on Pohakuloa Draft 2 EIS at Imiloa Astronomy Center by James V. Albertini, president of Malu 'Aina Center for Non-violent Education &amp; Action No Military Lease Renewal, No Land Swaps, Stop the Bombing and Desecration, Make the Military Clean Up its Toxic Mess, Return the Land to the Kanaka Maoli and pay reparation for destruction of the 'aina and psychological injuries caused! The Big Lie – We are Stewards of the Land." PTA commander LTC Timothy Alvarado, June 29, 2023, Hawaii Tribune-Herald A Few Simple Truths: 1. The land at Pohakuloa is zoned State conservation land, the highest protected land status. The land may not have been zoned "Conservation" in 1964 when the State lease was first issued, but it is zoned a State CONSERVATION district now. So NO lease renewal. Zero. NO Action. Firing a wide range of weapons from State leased conservation land into Federally seized conservation land is not pono. Conservation district is for protecting forest reserve, for cultural and archaeological, and biological resources. A Conservation District is Not for firing bombs, rockets, mortars, etc. How more basic can you get.</p>	<p>Compliance with HAR Chapter 13-5, Conservation District, has been revised and is discussed in Sections 1.4.2 and 5.3.2. Sections 1.4.2, 3.2, and 5.3.2 have also been revised to make clear that for analysis purposes, the EIS assumes BLNR would establish a special subzone in the conservation district through a rule amendment that allows for military training use. Such a special subzone would be novel and represents a departure from current Conservation District uses.</p>

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
James Albertini	Malu 'Aina Center for Non-violent Education & Action	The EIS states Commenters are directed to General Response 1 for comments not considered to be substantive, which acknowledges that the comment was received and reviewed. Examples include What are the possible wide range of toxins that may be in the impact area from 75 plus years of bombing and shelling. The questions is NOT considered substantive because the impact area is not on State leased lands which is the focus of the EIS, even though the toxins were fired from firing points on the leased lands. Even though continued bombing and shelling could spread the toxins all over leased lands and beyond.	<p>Section 3.5.3 states that the region of influence for hazardous substances and hazardous wastes includes the impact area due to the firing of military munitions from the State-owned land into the impact area. Section 3.5.6 evaluates the potential impacts from continuation of ongoing activities within the State-owned land, which affects areas such as the impact area.</p> <p>Sections 3.5.4.11 and 3.5.4.12 describe the extent of munitions constituents, including depleted uranium, within soil, groundwater, and surface water. Section 3.5.4.11 notes that the lack of migration of munitions constituents at PTA due to limited surface water and groundwater pathways from low rainfall, lack of perennial streams, and the deep depth to the groundwater aquifer.</p>
James Albertini	Malu 'Aina Center for Non-violent Education & Action	However, I want to note for the record that the Cultural Impact Assessment (CIA) in the draft #2 is deficient because it removed approx. 900 pages of informant testimony and analysis (Compare the CIA in the First DEIS vol 2 with Second DEIS vol 3).	<p>The first draft CIA was revised to improve readability, focus analysis within the project area and broad geographical area, and add information from new survey respondents and interviews. No information provided by the interviewee and survey respondents was removed from the DEIS CIA.</p> <p>Section 3.2.4.1. discusses the events of 1893 and the Apology Resolution in 1993.</p> <p>Section 3.4.4.5 has been revised to explain that all 25 previously recorded archaeological sites within the burn footprint on State-owned land have been subject to condition assessments that show no clear indication of damage or long-term impacts identified from the fire.</p> <p>Section 3.4.4.6 discusses the Army's CRM Program at PTA, including the State-owned land. Previous archaeological surveys are provided in Table 3-14 of the EIS. Section 3.4.4.3 discusses why portions of State-owned land have not been surveyed.</p>
Jim Albertini	Malu 'Aina Center for Nonviolent	Point 4. Whatever happens, mauka comes makai. We are all downwind, downhill, of Pohakuloa, on Hawaii Island. The military poisoning military families and civilians from	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
	Education and Action	Red Hill jet fuel leaks into Oahu water table is not an isolated military toxic event. The US Army secretly tested chemical, biological, and deadly Sarin nerve gas agents on leased land in Hawaii; the watershed called Waiakea Forest area that's south of Hilo. The military secret tests were repeatedly denied by the military but later confirmed. People spoke out in protest, and the issue was - and the lease was cancelled. Point 5. Claims of US owned land at Pohakuloa are misleading. Most lands at PTA like the 84,000 acres that includes the live fire impact area, were not purchased, but simply seized by an Executive Order, along with the 758 acres that includes the main base cantonment area and Bradshaw airfield. These were seized, as far as I know not even \$1, not even one cent was paid for those lands. Kao'olawe was also seized by an Executive Order, and finally returned by a new Executive Order. And we want to see that happened in Hawaii, as well, cancelling all the leases for the military.	
Jim Albertini	Malu 'Aina Center for Nonviolent Education and Action	Number 2. Depleted uranium, DU, is just one of many toxins used at the 132,000 plus acre site in over 75 years of bombing and shelling DU oxide particles can be carried long distances in the wind, and when inhaled, can cause a wide range of cancers, birth defects, and even genetic damage passed to future generations. DU as a half life of 4.5 billion years. A comprehensive, independent investigation of all toxins, including DU at Pohakuloa, is needed; not the military mongoose telling us that everything is okay in the Big Island hen house.	<p>Sections 3.5.4.11 and 3.5.4.12 describe the lack of mobilization of munitions constituents, including depleted uranium. Section 3.5.4.12 discusses the various studies of depleted uranium at PTA, including archival research, site reconnaissance, radiological instrumentation, soil samples, air samples, and a health and risk assessment, and notes that surveys found no indication of depleted uranium within the State-owned land.</p> <p>Sections 3.5.4.12 and 3.6.4 note: The Army completed a 1-year airborne uranium monitoring program in 2009 to determine if the decay and vaporization of DU fragments has impacted local air quality. The monitoring program collected 210 air samples from three sites upwind and downwind of PTA to provide a basis of comparison. The monitoring program concluded that the DU had not impacted air quality at PTA or in the surrounding area because the total airborne uranium levels in the collected particulate matter samples were within the range of naturally occurring uranium in Hawaiian soils and rock</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
James Albertini	Malu 'Aina Center for Non-violent Education & Action	And the wildfire analysis is deficient (the Federal firefighters at PTA are not trained or equipped for wildfire; they do airport fires)	<p>and were several orders of magnitude below U.S. and international chemical and radiological health guidelines.</p> <p>In accordance with DoD Instruction 6055.06, DoD Fire and Emergency Services Program, and the PTA Integrated Wildland Fire Management Plan, PTA firefighters respond to all fires on PTA lands and within the Army's Area of Responsibility. Per the Memorandum of Agreement between the Army and the Hawai'i County Fire Department, signed December 22, 2014, the Army is the primary responder to all fires within the PTA Area of Responsibility, which includes all areas within 25 road miles from the PTA boundary. PTA personnel implement procedures for prevention and suppression of all fires, including wildfires, in accordance with the Integrated Wildland Fire Management Plan.</p> <p>Section 3.16.4 was revised with additional information regarding PTA's fire department responsibilities. Section 3.16.4 also has information regarding PTA's capabilities to respond to wildfires.</p> <p>Mitigation measures the Army proposes include (1) negotiation of an agreement with the State to monitor wildfires on land not retained and (2) implementation of additional thermal technology. These mitigation measures have been added to the Mitigation Measures subsection.</p>
Jim Albertini	Malu 'Aina Center for Nonviolent Education and Action	Aloha! This is Jim Albertini again calling back. I was cut off on comments. I'm president of the community organization, Malu 'Aina Center for Nonviolent Education and Action on the Big Island, 'Ola'a, Puna District. I'd like to add a couple of other comments. Our organization supports the Kanaka Maoli right to restore their independent nation before the government was illegally overthrown in 1893 by US business interests, with the direct illegal assistance of the US military. We also support concerns about impacts to cultural and historic sites and practices at PTA. But we'll leave it to Kanaka Maoli to address these important issues. However, I want to note for the record that the cultural impact assessment, CIA, in	The first draft CIA was revised to improve readability, focus analysis within the project area and broad geographical area, and add information from new survey respondents and interviews. No information provided by the interviewee and survey respondents was removed from the DEIS CIA.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		draft two is deficient because it was removed. It removed approximately 900 pages of information and testimony and analysis.	
Jim Albertini	Malu 'Aina Center for Nonviolent Education and Action	So, these are important points. Again, final point, I would say, is: I remember the headline when the current PTA commander, Lieutenant Colonel Timothy Alvarado. The headline of the Tribune Herald, June 29, 2003, when he was sworn in as the commander. It said, quote, "we are stewards of the land" end quote. And I can't imagine a more insulting phrase to all of the people born and raised here, and that have experienced military toxins over the years, the destruction of the land, the psychological injury from the bombing of cultural sites and other things. And it's just a disgraceful thing to have as a commander to say; we are stewards of the land that bombs and shells. Our organization more than 20 years ago put together a map of military sites present and former on Hawaii Island. We documented 57 sites involving hundreds of thousands of acres, many of them still contaminated. That Waiakea Forest, hunters have told me that where the military tested chemical biological weapons in the Waiakea Forest area south of Hilo, which is Hilo's watershed, including Sarin nerve gas that kills at one twentieth of a drop; that they won't hunt animals there, that hardly anything grows in that forest; no vegetation, and that animals are toxic because of the military contamination in many parts of the island here, including Pohakuloa. So, anyway, no more military lease renewal. No land swaps. Stop the bombing, clean up your mess, and return the land to the Kanaka Maoli people, and pay reparations for the destruction of the land and psychological injuries caused. Mahalo.	Please see General Response 1.
Jim Albertini	Malu 'Aina Center for Nonviolent Education and Action	Aloha. My name is Jim Albertini. I'm president of Malu 'Aina Center for Nonviolent Education and Action in Kurtistown, 'Ola'a on the Big Island and I'd like to submit comment on the second draft. Okay. My position is strong to protect Pohakuloa. I call for no military lease renewal, no action. One. No land swaps. Stop the bombing and desecration at Pohakuloa. Make the military clean up its toxic mess. Return the lands to the Kanaka Maoli people, and pay reparations for the destruction of the 'aina and	Please see General Response 1.

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
		the psychological injuries caused to the Hawaiian people. Here's a few simple truths. Millions of live rounds are fired annually at Pohakuloa by the Army, Navy, Air Force, Marines and foreign troops; bombing, involving a wide range of weapons systems from dozens of firing points on land leased from the State of Hawaii. That's page 52 of draft 2 EIS.	
Jim Albertini	Malu 'Aina Center for Nonviolent Education and Action	It's also been reported that the Archaeological Survey was not fully completed. So that is deficient as well.	Section 3.4.4.6 discusses the Army's CRM Program at PTA, including the State-owned land. Previous archaeological surveys are provided in Table 3-14 of the EIS. Section 3.4.4.3 discusses why portions of State-owned land have not been surveyed.
James Albertini	Malu 'Aina Center for Non-violent Education & Action	4. Pohakuloa is a Lahaina firestorm in the making for Hawaii Island and the danger is increasing with climate change. There have been 892 recorded fires attributable to military activities at PTA since 1975 according to the military, but the military says many fire records prior to 2012 have been lost.(p. 354). The so called Leilani fire started on Pohakuloa in Aug. 2022 (one year before the Lahaina fire). The Pohakuloa Leilani fire burned more than 17,700 acres, including more than 12,400 acres outside of PTA, including areas of native endangered species .	Section 3.3.4 and Appendix K have been updated with more recent scientific data and surveys. Wildland fire analysis in Section 3.3.6 has been revised. Mitigation measures the Army proposes include: (1) a multi-year research project to identify possible biological controls in the native range of <i>C. setaceus</i> (fountain grass); (2) installation invertebrate surveys; (3) an ungulate impact assessment; (4) negotiation of an agreement with the State to monitor wildfires on land not retained; and (5) implementation of additional thermal technology. These mitigation measures have been added to the Mitigation Measures subsection. The text in Section 3.16.4 has been revised with additional information on historical wildland fires that have occurred on State-owned land and a table has been added summarizing historical fires documented on State-owned land since 2012.
Jim Albertini	Malu 'Aina Center for Nonviolent Education and Action	Number 3. Pohakuloa is a Lahaina firestorm in the making for Hawaii Island, and the danger is increasing with climate change. There have been 892 recorded fires attributable to military activities at PTA since 1975 according to the military. The military says, and I quote “many fire records prior to 2012 have been lost” end quote, page 3-54. One year before the Lahaina fire in Maui, a fire started at PTA, burned more than 17,700 acres, including more than 12,400 acres outside of PTA, destroying, endangered native species. PTA has the highest concentration of endangered species of any US. Army installation in the world, and PTA is destroying them.	Changes to wildfire risk from increased drought as a result of climate change is addressed in Section 3.6. Additional text was added to Section 3.16 regarding increased wildfire risk as a result of increased drought potential from climate change. Additional information on historical wildland fires that have occurred on State-owned land was included and a table was added summarizing historical fires documented on State-owned land since 2012.  Mitigation measures the Army proposes include (1) negotiation of an agreement with the State to monitor

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
			wildfires on land not retained and (2) implementation of additional thermal technology. These mitigation measures have been added to the Mitigation Measures subsection.
Jim Albertini	Malu 'Aina Center for Nonviolent Education and Action	And we understand that wildfire analysis is deficient because the federal firefighters at PTA are not trained and equipped for wildfires. They do airport fires.	<p>In accordance with DoD Instruction 6055.06, DoD Fire and Emergency Services Program, and the PTA Integrated Wildland Fire Management Plan, PTA firefighters respond to all fires on PTA lands and within the Army's Area of Responsibility. Per the Memorandum of Agreement between the Army and the Hawai'i County Fire Department, signed December 22, 2014, the Army is the primary responder to all fires within the PTA Area of Responsibility, which includes all areas within 25 road miles from the PTA boundary. PTA personnel implement procedures for prevention and suppression of all fires, including wildfires, in accordance with the Integrated Wildland Fire Management Plan.</p> <p>Section 3.16.4 was revised with additional information regarding PTA's fire department responsibilities. Section 3.16.4 also has information regarding PTA's capabilities to respond to wildfires.</p> <p>Mitigation measures the Army proposes include (1) negotiation of an agreement with the State to monitor wildfires on land not retained and (2) implementation of additional thermal technology. These mitigation measures have been added to the Mitigation Measures subsection.</p>
Jim Albertini	Malu 'Aina	The people of Hawaii deserve better management of their precious natural resources and cultural sites, prioritizing restoration and conservation over militarization. Lastly, there is a growing movement within our community advocating for the demilitarization of the island. The continued military presence is at odds with the values and aspirations of many residents who envision a future focused on peace, sustainability, and cultural preservation. Renewing this lease would further entrench the military's footprint on the island, diverting resources and attention away from initiatives that align more closely with these	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>goals. In conclusion, I urge you to reconsider the renewal of the military land lease on the Big Island. It is imperative that we prioritize the protection of our environment, ensure responsible land stewardship, and listen to the voices of the community calling for a shift towards a more peaceful and sustainable future. Thank you for your attention to this matter. Sincerely, Jim Albertini, President of Malu 'Aina \</p>	
Jim Albertini	Malu 'Aina	<p>Subject: Opposition to Renewal of Military Land Lease at Pohakuloa Training Area (PTA) on the Big Island, Hawaii            June 3, 2024 Dear atlr-pta-eis@g70.design I am writing to express my strong opposition to the renewal of the military land lease on the Big Island, Hawaii. As a concerned citizen deeply invested in the environmental and social well-being of our island, I find the current proposal to extend this lease both troubling and unacceptable for several critical reasons. First and foremost, the environmental review process has been woefully inadequate. The documentation provided fails to thoroughly assess the long-term environmental impacts of continued military presence on the land. This oversight is particularly concerning given the rich biodiversity and delicate ecosystems that characterize the Big Island. The potential for irreparable harm to native species and habitats necessitates a far more rigorous and comprehensive review than what has been presented. Furthermore, the history of land stewardship, cultural and historic impacts, under military control has been subpar. There have been numerous instances of environmental degradation and insufficient remediation efforts, which have resulted in lasting damage to the land and surrounding communities. The military's track record does not inspire confidence that future stewardship will be any different. There has been irreparable harm to cultural and historic sites, as well as native species.</p>	<p>Chapter 3 includes the impacts of continuation of ongoing activities. Chapter 4 addresses past activities by conducting impact analysis through the lens of cumulative impacts.</p> <p>Sections 3.3 and 4.4 revised to state the significant impacts on biological resources from repeated wildland fires.</p> <p>Section 3.4 recognizes the past impacts on historic and cultural resources and cultural practices, including significant impacts on cultural practices. Section 5.5 discusses the irreversible and irretrievable commitment of resources as it pertains to historic and cultural resources and cultural practices.</p> <p>Section 3.17 summarizes the mitigation measures proposed to reduce adverse impacts from the Proposed Action.</p> <p>Section 4.4, Biological Resources, addresses biodiversity and other biological resources.</p> <p>Appendix E lists the existing best management practices, standard operating procedures, management measures, and mitigation measures the Army uses to implement environmental monitoring and conservation efforts within the State-owned land.</p>
Loke Aloua		<p>Greetings, My name is Loke Aloua I am a resident of Hawai'i Island and I oppose any land retention by the U.S. Military and support the "No Action Alternative." The U.S. Military conducts harm here on our island and abroad. The</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		activities that take place are in no way in alignment with what is pono for the land, water, and people.	
Loke Aloua		Findings in Ching v Case (2019) concluded failures of the military to abide by lease conditions and too the State to ensure that lease conditions were indeed being met. The court further concluded that the State has breached its constitutional trust duties to beneficiaries. Prior to any or all portions of lands considered for sale, lease, or appraisal conclusions of the court remain to be met. Any action otherwise would again be a violation of the State to act in duty to the trust and its beneficiaries. Thus, I have the following questions: What actions has the military taken to comply with the Ching v Case (2019) court conclusions? What documentation is available to demonstrate that cleanup has commenced and been completed? What is the financial assessment of the cost for the cleanup of exploded and unexploded ordinances, trash, etc within the leased lands? What were the criteria and measurables that guide and inform any cleanup efforts? Since the Ching v Case (2019) court findings how much money has the military spent on conducting a clean-up to comply with Ching v Case (2019) findings? Should these lands be retained in entirety or partial what are the environmental impacts to the aquifer and groundwaters? How does the seismic impact of training activities produced by the use and access of these leased lands impact the aquifer system?	Please see General Response 1.
Loke Aloua		Furthermore, these are stolen lands that were illegally seized by the U.S. government and branches of their extended arms. May these lands be set free, may the people rise, may the akua reclaim Loke Aloua	Please see General Response 1.
Loke Aloua		Use of these lands operate as a component of a much larger training center, thus what are the cumulative environmental impact to the 132,000 acres of lands by PTA?	Table 4-1 presents past, present, and reasonably foreseeable future actions, including those throughout PTA and outside PTA, that have the potential to contribute to cumulative impacts. These actions are analyzed as part of cumulative impacts in Sections 4.4 and 4.5.  The region of influence for cumulative impacts is explained in Section 4.2.2.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
Loke Aloua		What scientific evidence suggests that the impacts to the groundwater and aquifer system is acceptable and determined to mitigatable? What determinations by the Commission on Water Resources Management have been made to ensure protection of water resources?	<p>The best available scientific data for groundwater and surface water quality was incorporated into this EIS. Groundwater and surface water quality are discussed in Section 3.9 of the EIS. Section 3.9.4.6 of the EIS documents the existing management measures utilized by the Army to protect water resources. The State Department of Health (DOH) Safe Drinking Water Branch (SDWB) monitors groundwater quality of aquifers as described in EIS Section 3.9. SDWB has released groundwater contamination maps for Hawai'i Island that show most contamination is along the eastern coast of the island. The DOH SDWB Environmental Health Portal can be accessed at <a href="https://eha-cloud.doh.hawaii.gov/sdwb/#!/home">https://eha-cloud.doh.hawaii.gov/sdwb/#!/home</a></p> <p>Section 3.9.4.2 has been updated to include additional information from the Thomas (2019) report. A link to this report has been added to the PTA EIS website (<a href="https://home.army.mil/hawaii/ptaeis/project-home">https://home.army.mil/hawaii/ptaeis/project-home</a>) under the "Documents" tab.</p>
Loke Aloua		These lands are zoned as conservation lands and should remain classified as such. Current use of these lands for military training activities are in conflict with this conservation land use.	Compliance with HAR Chapter 13-5, Conservation District, has been revised and is discussed in Sections 1.4.2 and 5.3.2. Sections 1.4.2, 3.2, and 5.3.2 have also been revised to make clear that for analysis purposes, the EIS assumes BLNR would establish a special subzone in the conservation district through a rule amendment that allows for military training use.
Nicole Kuwala Anakalea		Aloha mai kakou, o wau Nicole Kealohalanikuwaluikapoleiokawahine Anakalea. Nicole Anakalea Kuwalu they call me. I look at you guys and I see my warriors. I see my soldiers. I see the demise of my time period warriors. And so I sit here and I -- I want to aloha you guys for your patience. And aloha to just to sit and listen. I'm originally from the island of Maui. I am -- I am a child during the time of PKO, Protect Kaho'olawe 'Ohana. I witnessed Kaho'olawe being bombed. I witnessed my kupuna crying for that island to be saved. I saw the island be saved by PKO, and we were proud and everybody was celebrating that we got Kaho'olawe back. And what we didn't know and what they didn't teach us was that they	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>gave us five times -- they gave away five times the size of our island someplace else. I moved here to this island and that's when I learned that Kaho'olawe actually existed right here, and I was living on an island that I saw being bombed. I live in Waimea. I come here today, because of my kupuna who sit on the beaches of Maui for Kaho'olawe and I stand for my two sons who will become the next generation who will live in this space and place. My time is short, and I know my minutes is short. So a couple of things I just want to -- I, you know, I was trying to write notes. Sorry. Never mind. I share what -- what Kalani had talked about a little bit and this is where it's wahi pana. And the word wahi pana has to do with sacred places. Wahi, meaning a place. Pana, more importantly meaning a pulse. And so when Kalani talks about those energies, that -- that place has a pulse and it's something that we all feel. Aloha to you who have been here 10 months. You haven't been long enough. You haven't been here long enough to feel the pulse. And that's part of the problem is that in two years, probably going to get someone who is not a general sitting over here and not going to be the same person. So how do we create a relationship when we don't have consistency in our pilina and the relationships that we build. With that, that's been the story of us since, again the overthrow -- since the occupation -- since everything that's been happening to us, it's just been consistent. So we kind of have this thing that the kupuna tell me, well the first time shame on me or shame on you, the second time, shame on me. So the first time, shame on you for allowing Kaho'olawe to happen. Now, shame on me for continuing this and allowing this to happen. So if we don't stand up and we don't say something, then it is shame on me because we are repeating history all over again. And I don't care what other people really say about how good you guys is. So I'm going to tell you, that's another thing I want to share my feelings about that. Mahalo for all the positive things that you've shared, but what you don't put in your report, and what you don't tell the people is all the stuff that they're grumbling about and all the truths of the damage that's been done. I don't see none of that on your</p>	

Responses to Second Draft EIS Comments

Commenter	Submitted By	Comment	Response
		<p>posters. I don't see the devastation and then I don't see the reparation. I take offense, especially to action four when it says that if we leave -- you're not our welfare. You came over here, you give us all these things that you list over there. Here, we gave you this, we gave you this, we gave you this, we gave you this, as if we're supposed to feel like -- like privileged for that. No, we're not. You owe that, and yet you still haven't done any reparation for all the damage that's been done. So my question to you guys is, why can't you share what you know you've done wrong, then tell us, what is your plan to make it better. More importantly, as well, is, where is the due diligence in making sure that our -- our community is seeing your actions in this reparation. You're talking, you helu about all these things. You count out all these things, but we're -- again, she's talking about, you couldn't even put out one flyer or something like that in the mail. We get them from other representatives, hundreds of rubbish in my -- that was not rubbish. That's something that I would like to know. So you give so many solutions in how you can actually create a relationship here, but that's not happening. Sorry. My thing is, you also say that this is the only place in the whole wide world where you can, like have this kind of training, then keep it special. That's your job. How come you're not doing that? If you're saying this place is so great, then why are you not making that special? My biggest offense really, was when you said, if we're going to action four, I don't believe in -- in selling my land. I am Aloha 'āina. I don't believe in that. I had to -- we are going through all of this right now in -- in the pae 'āina. But what I got offended by, and I want to say this with all my aloha is, when you said if we do action four, we leave, we do nothing, we get no cultural aloha, we get no environmental aloha. I'm like, wow, brah. Really? So even if it doesn't go your way, you're going to be the cry baby that can walk away and make like nothing would happen. I have a problem with that. Fix what you guys did. Whatever you guys choose, fix it. That is your guys' kuleana. Mahalo.</p>	

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
Shani Anderson		Stop bombing Pohakuloa. The military must clean up the sacred lands it has desecrated and leave Hawai'i. No new lease or land swap.	Please see General Response 1.
Sven Andes		Stop destroying Hawai'i for the purpose of training the next generation of poor folks tricked into joining the US war machine.  Leave Hawai'i. Freedom and respect for Hawai'i.	Please see General Response 1.
Luna Animisha		Please, give this land back to Hawai'i and Kanaka Maoli. Now, more than ever, with the global plastic crisis, oil pollution crisis, and soil degradation crisis worldwide, it is important to shift our focus from military-industrialization to sustainability. There are people living in Hawai'i with no homes, and who have been pushed out of their homes, and some of these people have lived here for generations. I urge you to do the righteous and just action, and uphold the ideals which the founding fathers of America asked for: liberty and justice for all. These ideals will only be upheld if this land, which was wrongfully taken and not contractually honored, is returned to the people and to Hawai'i. Thank you and God Bless.	Please see General Response 1.
Kyhl Austin		I strongly OPPOSE the retention of Pohakuloa by the U.S. Army. The proposed lease should NOT BE RENEWED. The U.S. Army should be responsible for remediation and environmental clean-up of all land damaged by its use by the U.S. Army.	Please see General Response 1.
Kalia Avery		My name's Kalia Avery. I've lived in Hawaii for 45 years. I came from America and I was a child of the Vietnam War. And I knew from a very small age that the military was -- was not our friend. I moved to Hawaii and I've been very grateful for all the Kānaka Maoli for welcoming me, for treating me with respect and kindness. And I have learned so much since I've lived here about how they were treated. And, basically, America came in with a bunch of businessmen and stole their own -- their nation, and they were backed by the US military. The US military has poisoned the lands here. We do not want you here. It's time for people to really tell the truth about the history of Hawaii and hear that -- the people need to be heard that live here. These are a strong people, and as much as	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>America would have loved to squelch and squash, these people are strong and they're coming back and they're rising up. And as we can see from these beautiful children that have spoken tonight, we have such a great future to look forward to and we hope that that future does not include you on Pohakuloa or any other beautiful place that is -- is a respectful, you know, spiritual place in Hawaii, which is all of Hawaii. So please pack your bags and we don't want you here anymore. Mahalo.</p>	
Leilani Badamo		<p>Aloha mai kākou. 'O Leilani Badamo ko'u inoua. O kūpunawahine mai Hana, Maui, o makuakane mai Wailuku, Maui. My mother was born and raised in Mākaha. My father was born and raised in Brooklyn, New York. My father was in the military in the Marines. That's how he met my mother. Three generations back my family, I am literally a product of the military, the colonizer, and the "colonized." So -- and -- and that goes three generations back in my family. I was here in Hawai'i nei until I was about three. And then my family moved to New York. My father being in the Marines, right, he raised us really rigidly. When we were scolded, we were put the three of us in a line by height order. He would -- we didn't -- so we got the belt, leather belt, metal buckle. We got the shit beat out of us when we were misbehaving. However, the worst part is when he would give us a four-hour lecture and dehumanize us. So I understand as an adult later on from being physically abused and a bar soap put in my mouth when we were cursing at each other that he was brainwashed from the military. And that was how he was taught maybe as a child and I don't know in the military, like, that was discipline. Anyway, one thing that he did with all of us before we were able to reach the sink was to learn how to wash dishes. That was one of the things that we went through. But my parents taught me that when you make a mess, you clean it up. When you make a mess, you clean it up. That's your kuleana or responsibility, if you don't know that term. My daughter's here with me today and I asked her if she wanted to speak and she didn't want to speak. She didn't actually even want to come because, like, "Mom, what is this about? I</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>don't want to go." And so I was telling her what it is about because it's important for her to know. So I'm hapa, mixed, right? Hawaiian, Chinese, Portuguese, Italian, Dominican. From all parts of my family, I learned about taking care and having responsibility for the things that you do, the actions that you take. Now I'm asking you as humans in front of me, I'm sure you have families, I'm sure you eat food, and I'm sure that you drink water. So when you do these things on a daily basis, put yourself in the shoes of the Kānaka Maoli and think about what you're doing to our 'āina, what you're doing to our water. Because our water is not just our water, it's your water. It's water you drink. The people in Red Hill, they're drinking that poisoned water that the -- the -- the military poisoned, that -- that's water everyone drinks, right? So I -- I know you probably have a nice, you know, it's -- I was a -- I'm a trained welder, actually. I worked seven years as a welder for the Boilermakers Union. I could have taken a job on Oahu making a ton of money with the military, but I chose not to. I'm studying agriculture and I will leave my statement with this. If you study anything in nature, you can google it very quickly, tsunamis, mudslides, everything in nature will destroy anything manmade. And I'm telling you now that the lāhui is strong like nature. Thank you.</p>	
Christoph Baranec		I support Alternative 1: Maximum Retention. Mahalo!	Please see General Response 1.
Julie Barreto		Please do NOT extend Army authority over Pohakuloa!	Please see General Response 1.
Kristin Barrett		<p>Comment 1 The term "reasonable action" is used throughout all three documents frequently to describe how the Army might mitigate an impact. For example, on page 3-18 of the Second Draft EIS, Volume 1, it was used to describe how the Army might mitigate light pollution. Using the term "reasonable action" allows for massive loopholes in following through with those actions. Any planned mitigation actions can be easily written off as not reasonable and therefore not required. For all occurrences of the words "reasonable actions," re-word to state exactly what will be done and when. The term "reasonable actions" is too vague and non-binding.</p>	<p>PTA follows USAG-HI's Policy Memorandum USAG-HI-35, Wildlife Friendly Lighting and Dark Skies, and adheres to state and local laws where practicable, including the County of Hawai'i Outdoor Lighting Ordinance, and regulations to minimize operational light pollution including retrofitting lights and adherence to Unified Facilities Criteria 3-530-01, Interior and Exterior Lighting Systems and Controls. The term reasonable action is not used in the EIS for proposed mitigation measures. The term "reasonable action" is stated in the EIS when referencing existing management measures or in Appendices such as the 1964 lease or Court-Ordered Management Plan.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
Kristin Barrett		<p>Comment 3 Provide a list of all hazardous waste collected and shipped off-site or stored on-site in the last year. Describe exactly how you comply with Federal hazardous waste regulations under the Resource Conservation and Recovery Act (RCRA), the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). Simply stating that the Army has similar regulations is not enough. State how you comply with the Federal regulations. Simply listing that these regulations are required is not enough information for the reader to understand your impacts.</p>	<p>Hazardous wastes manifests can be obtained through the Freedom of Information Act process. The FOIA Library and FOIA Request process are available at: <a href="https://www.rmda.army.mil/foia/RMDA-FOIA-Division.html">https://www.rmda.army.mil/foia/RMDA-FOIA-Division.html</a>.</p> <p>The Proposed Action is a real estate action (i.e., administrative action) that would enable continuation of ongoing activities on the retained State-owned land. Chapter 3 of this EIS lists the regulatory environment, best management practices employed by the Army by resource area, and analyses of impacts to each resource area. The current status of range management activities regarding hazardous substances and hazardous wastes is discussed in Section 3.5.4. The Proposed Action's consistency with regulations, land use plans, policies, and controls is provided in more depth in Section 5.3.</p>
Kristin Barrett		<p>Comment 4 Provide maps showing all sites that contain toxic, hazardous and/or radioactive substances that have been placed on site since the inception of the lease. Provide a detailed description of each toxic element and how each will be cleaned up and properly disposed of and a timeline of when. Simply listing that these regulations are required is not enough information for the reader to understand your impacts.</p>	<p>Please refer to Figure 3-10 and Sections 3.5.4 and 3.5.6. The current status of range management activities regarding hazardous substances and hazardous wastes is discussed in Section 3.5.4. Sections 2.1 and 3.5.6 describe the cleanup activities to be performed on any State-owned land not retained.</p>
Kristin Barrett		<p>Comment 5 Provide a detailed description of how hazardous waste, as defined under the Resource Conservation and Recovery Act is currently managed. Simply listing that these regulations are required is not enough information for the reader to understand your impacts.</p>	<p>The current status of range management activities regarding hazardous substances and hazardous wastes is discussed in Section 3.5.4.</p>
Kristin Barrett		<p>Comment 6 Provide a list of all toxic substances in use at the facility and the amount released annually to the air, water, land or sea. Simply listing that these regulations are required is not enough information for the reader to understand your impacts.</p>	<p>Hazardous wastes manifests can be obtained through the Freedom of Information Act process. The FOIA Library and FOIA Request process are available at: <a href="https://www.rmda.army.mil/foia/RMDA-FOIA-Division.html">https://www.rmda.army.mil/foia/RMDA-FOIA-Division.html</a>.</p> <p>The Proposed Action is a real estate action (i.e., administrative action) that would enable continuation of ongoing activities on the retained State-owned land.</p>

**Responses to Second Draft EIS Comments**

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			Chapter 3 of this EIS lists the regulatory environment, best management practices employed by the Army by resource area, and analyses of impacts to each resource area. The current status of range management activities regarding hazardous substances and hazardous wastes is discussed in Section 3.5.4. The Proposed Action's consistency with regulations, land use plans, policies, and controls is provided in more depth in Section 5.3.
Kristin Barrett		Comment 8 Provide a detailed description of how drinking water for military personnel and contractors on the site is monitored and how compliance with Safe Drinking Water Standards is ensured. Simply listing that these regulations are required is not enough information for the reader to understand your impacts.	Section 3.15.4 of the EIS describes how drinking water used on PTA is purchased and stored on site after it is transported via trucks to three non-U.S. Government-owned ASTs located on State-owned land.
Kristin Barrett		Comment 9 Provide a map showing the location, age, and size of all storage tanks on the site including underground storage tanks. Provide monitoring data to prove these tanks are not leaking. If they are leaking, provide a contaminant cleanup plan with measurable goals and dates of completion. Simply listing that these regulations are required is not enough information for the reader to understand your impacts.	Figure 3-10 illustrates the location of the only storage tank on the State-owned land. Additional information on storage tanks and associated monitoring data can be obtained through the Freedom of Information Act process. The FOIA Library and FOIA Request process are available at: <a href="https://www.rmda.army.mil/foia/RMDA-FOIA-Division.html">https://www.rmda.army.mil/foia/RMDA-FOIA-Division.html</a> . The Proposed Action is a real estate action (i.e., administrative action) that would enable continuation of ongoing activities on the retained State-owned land. Chapter 3 of this EIS lists the regulatory environment, best management practices employed by the Army by resource area, and analyses of impacts to each resource area. The current status of range management activities regarding hazardous substances and hazardous wastes is discussed in Section 3.5.4. The Proposed Action's consistency with regulations, land use plans, policies, and controls is provided in more depth in Section 5.3.
Kristin Barrett		Comment 10 Provide a copy of your Stormwater Management Plan. Simply listing that these regulations are required is not enough information for the reader to understand your impacts.	PTA does not have a NPDES permit since there are no point source discharges of stormwater to waters of the U.S. Periodically, construction projects that exceed one-acre are issued a general NPDES permit under Appendix C, under HAR 11-55, which require an approved Stormwater Pollution Prevention Plan. Due to low rainfall and geology, there is little stormwater conveyed, and drainage is not connected to streams which allows for

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
			<p>infiltration on site.</p> <p>Section 3.9 discusses stormwater runoff at PTA.</p>
Kristin Barrett		<p>Comment 7 Provide a map of aquifers under the entire training site, perched or otherwise. Provide all monitoring data to demonstrate that these aquifers are not contaminated. Simply listing that these regulations are required is not enough information for the reader to understand your impacts.</p>	<p>A map of aquifers under the Pōhakuloa Training Area site, perched or otherwise, is provided in Section 3.9.4.1 of the EIS and titled "Figure 3-20: Aquifers".</p> <p>The best available scientific data for groundwater and surface water quality was incorporated into this EIS. Groundwater and surface water quality are discussed in Section 3.9 of the EIS. Section 3.9.4.6 of the EIS documents the existing management measures utilized by the Army to protect water resources. The State Department of Health (DOH) Safe Drinking Water Branch (SDWB) monitors groundwater quality of aquifers as described in EIS Section 3.9. SDWB has released groundwater contamination maps for Hawai'i Island that show most contamination is along the eastern coast of the island. The DOH SDWB Environmental Health Portal can be accessed at <a href="https://eha-cloud.doh.hawaii.gov/sdwb/#!/home">https://eha-cloud.doh.hawaii.gov/sdwb/#!/home</a></p> <p>Section 3.9.4.2 has been updated to include additional information from the Thomas (2019) report. A link to this report has been added to the PTA EIS website (<a href="https://home.army.mil/hawaii/ptaeis/project-home">https://home.army.mil/hawaii/ptaeis/project-home</a>) under the "Documents" tab.</p>
Kristin Barrett		<p>Comment 2 The EIS is referred to as "an administrative environmental Impact Statement" that is just a real estate agreement. There is no such thing as an administrative EIS. Saying that it is administrative or that its just about a real estate transaction is untruthful and very misleading. Strike all references to administrative EIS that is only about a real estate transaction.</p>	<p>The Proposed Action (land retention) is an administrative action; no new activities are proposed. The EIS provides substantial detail regarding existing conditions from ongoing activities and potential impacts from the Proposed Action (land retention), continuation of ongoing activities in State-owned land retained, ending ongoing activities in State-owned land not retained, lease compliance actions, cleanup and restoration activities, and mitigation measures.</p>
Ashley Baxter		<p>Hi, I heard that tonight is the deadline for public comments to go in regarding the lease renewal for Pohakuloa base. I do not like that the shelling has been going on, that various undetonated bombs are scattered</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		all over and that chemicals/toxins that seep into the land and water here as a result of that so I oppose that. Thank you, Ashley Baxter, Hilo resident.	
Rosemary Bearden		I strongly oppose the Army Training Land Retention at Pohakuloa Training Area on the island of Hawai'i. Pohakuloa is a wahi pana of great importance to Kanaka Maoli. The bombing of this scared land for the sake of war games is unacceptable. The Army's history of destruction in Hawai'i should come to an end-- the lease should not be renewed. I strongly oppose the renewal of the Army's lease at Pohakuloa.	Please see General Response 1.
BETSY BEHNKE		I understand that the military needs areas for training. I also know the military has done a very poor job of cleaning up the areas it has used. In seeing how the Navy is back tracking on some of the damage it caused in drinking water on Oahu my inclination is to move the military out as much as possible. I have very little trust in the military. For the military that uses parts of our state I would expect payment as from any other source, not a reduced fee. The military must clean the areas it has damaged. I definitely would like the military out of Makua.	Please see General Response 1.
Lana Bilbo		Aloha, This testimony is in favor of the No Action Alternative for the Pohakuloa Training Area Lease. I support: * An end to the current lease so the army retains none of the 23,000 acres * Hiring a third party consultant to evaluate all 132,000 acres the Army occupies * An IMMEDIATE ceasefire on all conservation lands in the PTA * That conservation lands are NOT allowed to change zone classifications * Implement an immediate cleanup and restoration funded by the Army The Army's destruction of Hawaii's lands needs to stop. The US military has proven over and over that they are incapable stewards. Please confirm this testimony was received Thank you for your time, Lana Bilbo	Compliance with HAR Chapter 13-5, Conservation District, has been revised and is discussed in Sections 1.4.2 and 5.3.2. Sections 1.4.2, 3.2, and 5.3.2 have also been revised to make clear that for analysis purposes, the EIS assumes BLNR would establish a special subzone in the conservation district through a rule amendment that allows for military training use.
Leonida Binda	Leonida Binda	Hi, we would like to help build and do donations with are company. We have inherited from Hawaii. My name is leonida Binda and John Noti is my fiance (retired from white house and us Marines retired. Are friends still work there. Which will be working with everyone. I haven't meet the president or vice President yet.	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
Daniel Bishop		<p>Aloha</p> <p>My name is Daniel Bishop</p> <p>First; I believe that All Activities by a Belligerent Illegal Occupier, the United States of America, and their Military representatives shall cease on Stolen Hawaii Kingdom Lands and Waters.</p> <p>Second; Said Illegal Occupant shall start the process of Restoration of All Lands and Waters ,and return these Lands, and Waters, to the condition found prior to the use by the Illegal Occupant.</p> <p>Third; Illegal Occupant shall start reparations in the form of just monetary compensation for the Abuse of Lands, Water and Beneficiaries of the Hawaiian Kingdom. This monetary compensation should be held in trust for the beneficiaries of Kingdom Subjects until such time as a qualified representative be appointed to administer these funds to beneficiaries.</p> <p>Fourth; The process, as prescribed by the United Nation, shall be initiated to Restore the Hawaiian Kingdom as the Steward of All Assets of Hawaiian Kingdom subjects as well as their beneficiaries.</p> <p>Fifth; During the implementation of the aforementioned steps the Illegal Occupier should reduce its presence within the recognized borders of pre 1893 overthrow, to also include any lawful adjustments that have been made during modern times (ie especially, but not restricted to International Waters) Upon completion of the above demands, the Illegal Occupant shall Remove themselves from the Hawaiian Kingdom until a fair and just agreement be made between the United States and Kingdom representatives about the scope of relationship between the two States.</p> <p>Sixth; The United States shall abide by the Treaty of First Nations signed by their Representative in 1843, prior to the illegal overthrow</p> <p>Respectfully Submitted</p> <p>Daniel Bishop</p>	Please see General Response 1.
Patricia Blair		I strongly oppose any extension to the army's lease at Pohakuloa. Millions of live rounds fired annually at	Sections 3.5.4.11 and 3.5.4.12 describe the lack of mobilization of munitions constituents, including

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>Pohakuloa result in depleted uranium as just one of many toxins used. Particles can fly long distances in the wind, inhaling can cause cancer, birth defects, gene damage to humans. Why would you want to do that? Just as the Navy has/ is destroying Hawaii's water, this training destroys the land. So what's the purpose of this military if it's destroying what is precious.? Better Hoponopono, diplomacy is used to settle disputes. Invasions are immoral.</p>	<p>depleted uranium. Section 3.5.4.12 discusses the various studies of depleted uranium at PTA, including archival research, site reconnaissance, radiological instrumentation, soil samples, air samples, and a health and risk assessment, and notes that surveys found no indication of depleted uranium within the State-owned land. Sections 3.5.4.12 and 3.6.4 note the following: The Army completed a 1-year airborne uranium monitoring program in 2009 to determine if the decay and vaporization of DU fragments has impacted local air quality. The monitoring program collected 210 air samples from three sites upwind and downwind of PTA to provide a basis of comparison. The monitoring program concluded that the DU had not impacted air quality at PTA or in the surrounding area because the total airborne uranium levels in the collected particulate matter samples were within the range of naturally occurring uranium in Hawaiian soils and rock and were several orders of magnitude below U.S. and international chemical and radiological health guidelines. Text added to Section 1.2.5 to note: Approximately 1.7 million rounds of military munitions are fired at PTA annually. Approximately 95 percent of the military munitions expended at PTA are small arms (9 millimeter or less), of which 10 percent are blanks. For larger munitions, (n=66,677), 79 percent (n=52,627) are inert (i.e. have no explosive component). Section 2.2.6 added and Table 2-2 revised to consider other alternatives mentioned by the public during the Second Draft EIS public review period and previously addressed in the Analysis of Alternatives Study (2017). These alternatives do not meet the purpose and need of the Proposed Action and do not meet the screening criteria; therefore, they were considered and eliminated from detailed study in the EIS.</p>
Lawretta Blanch		<p>The white man has taken so much already from the Hawai'ians. Taken, by force. I live on this Island, I am white, I vote in EVERY election. I have lived Big Island for decades, I pay taxes. I say do not continue to take from the Hawai'ans... AND YOU ALREADY KNOW ALL THE REASONS WHY! I have sent so much testimony and spoke</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>at every meeting... you come, you listen AND NOTHING EVER EVER CHANGES. THE GOVERNMENT CONTINUES TO STEAL MORE FROM THE HAWAIIANS.</p> <p>If anyone ever reads this please know, if you could have done something, and you did not help, you are as bad as those who stole everything from these people. You may receive benefit in this lifetime, but I am sure in my heart that you will face the consequences of your actions after you pass.</p> <p>As sure as I am that the military will continue to bomb this Island. Because we can COMMENT until we are blue in the face, you do not care. The military will grab more, they always have. The people begging to have their land returned are ignored once more. Shame.</p>	
Kaysie Blersch		<p>The use of these lands by the military will be devastating to both the environment and population of Hawaii. Please do not renew the lease at Pohakuloa. In fact, it would be best if there were no army bases at all on the Hawaiian islands, as we've seen time and again large fuel spills, construction, and weapons testing hurt all living things on the islands. The ecosystem there is quite delicate, and the Hawaiian Natives have had too many tragedies recently. Their lands and livelihoods need to be protected.</p>	Please see General Response 1.
Richard Bodien	Hawai'i Cigar	<p>The time has come to end this disaster. Stop destroying the Aina. Just say no to further militarization. Mahalo, Richard Bodien Hawi</p>	Please see General Response 1.
Shantee Brown		<p>And further, the even larger aspect of what Pohakuloa represents to me, recently in the last couple years, Brown University put out a study for the impacts the last -- of the 21st century war -- wars that the U.S. has basically killed 4.5 million people in occupation of Syria, Libya, Afghanistan, Iraq, Somalia. One million directly through bombings, similar to what is trained in Pohakuloa, and 3.5 million because of their agriculture being decimated, their medical facilities, everything that you need to sustain a society -- sewage, to the point that today, one out of ten Afghani children, newborns, will die. In my family in the last 25 years, if that were applied, I would lose three</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>family members at birth -- three, and that's their norm. That's what happens from this training in other parts of the world. And that's just in the last 25 years. That's not including all of the previous occupations. And the fact that Iraqi people are still dealing with white phosphorus and the depleted uranium from the razing of their city -- of their cities, things that were tested here -- similar weapons, that's not okay. That needs to be part of the EIS. So no action alternative, need to clean up the land, no fee simple transfer of land, none of that, and also we need reparations for what was done here. Thank you.</p>	
Shantee Brown		<p>Hello. My name is Shantee Brown. I was raised below Pohakuloa in Waikoloa Village. I live in Kona. And I want to second the three people before me, all of their statements in support of no action alternative. And I want to add that this EIS is also incomplete because it lacks the human part of the environment, and we are a part of our environment -- humans -- all of us here. And Pohakuloa, being the center of our island, all 200,000 of us are downwind and downstream of Pohakuloa. Pohakuloa doesn't exist in a lab. There's no rainbows and unicorns creating some bubble over the wind after you guys' bomb and all of the things that haven't been cleaned up. And I don't think that the Army has done an adequate or a legal job at informing stakeholders -- all of us here. Just international law, you have to give indigenous people free and informed consent, right, there's -- you guys could send a postcard to everyone on this island about this process and let them know what's happening and that doesn't happen. The people who live in Puna or Hilo that work on -- in the Wailuku resorts, they are not being told what they're driving through.</p>	<p>Section 1.6.4 and Section 8.3 of the Second Draft EIS discuss the notice of availability to the public for the Second Draft EIS. Sections 3.10 and 3.11 discuss impacts on Socioeconomics and Environmental Justice.</p>
Shantee Brown		<p>The people who work in the Wailuku coast and or Kohala coast that drive through Saddle Road 10 times a week, are they being informed about what their risk is? And you can't fix what you don't study. And the Army, their own former Army doctor, Dr. Lorrin Pang, Hawaii's own, has said that the Army tests for depleted uranium are inadequate. They can't show the whole picture. They</p>	<p>See Sections 3.5.4.12 and 3.6.4 for a discussion on depleted uranium and the Army's 2009 air quality monitoring program, which concluded depleted uranium had not impacted air quality at PTA or in the surrounding area.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
Skyler Brown		<p>won't show the whole picture and we need independent studies for the depleted uranium.</p> <p>Aloha. It should go without question that our CRITICAL watershed , affecting the entire island , be bombed on the regular. It's a disgrace! A'ole!</p>	<p>The best available scientific data for groundwater and surface water quality was incorporated into this EIS. Groundwater and surface water quality are discussed in Section 3.9 of the EIS. Section 3.9.4.6 of the EIS documents the existing management measures utilized by the Army to protect water resources. The State Department of Health (DOH) Safe Drinking Water Branch (SDWB) monitors groundwater quality of aquifers as described in EIS Section 3.9. SDWB has released groundwater contamination maps for Hawai'i Island that show most contamination is along the eastern coast of the island. The DOH SDWB Environmental Health Portal can be accessed at <a href="https://eha-cloud.doh.hawaii.gov/sdwb/#!/home">https://eha-cloud.doh.hawaii.gov/sdwb/#!/home</a></p>
Shantee Brown		<p>Aloha, My name is Shantee Brown. I live in North Kona and was raised below Pōhakuloa in Waikōloa Village. I support No Action Alternative for Pōhakuloa Training Area. Remediating the land in preparation of the end of the lease is the only action that will benefit Hawai'i Island. I also recommend that the Hawai'i State Department of Land and Natural Resources reject the 2nd Draft Environmental Impact Statement due to insufficient improvements made to the 1st Draft EIS. My concerns are related to environmental justice, wildfires, improper use of conservation lands, and lack of independent studies on cumulative health impacts related to the spread of aerosolized contaminants such as lead and depleted uranium. I have many more concerns but the 45 day public comment period makes it impossible to properly address every section in the EIS. Listed below are the Executive Orders from the EIS that the Army is required to follow. The Army is doing a poor job at honestly following these regulations.</p>	<p>Please see General Response 1.</p>
Shantee Brown		<p>The Army repeatedly makes statements such as, "Due to the distance between the State-owned land and the closest residential area (4 miles), there would be no disproportionate adverse impacts on communities with environmental justice concerns." This does not reflect the</p>	<p>See Sections 3.5, 3.6, 3.7, and 3.11 for information on hazardous substances and hazardous wastes, air quality, noise, and environmental justice impacts, respectively. Please also see Appendix D, Draft EIS comments and responses.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>2022 + 2024 public comments made by residents of Waikōloa and Waimea stating that they can feel the bombings and worry about what contaminants may be in dust from Pōhakuloa. Both towns are 14 miles away. Residents from across the island experience distress knowing that Pōhakuloa is repeatedly bombed and not cleaned up. On May 22th, 2024, a Native Hawaiian woman shared a video on social media, completely distraught, verbalizing that she was trying to correctly harvest ‘a‘ali‘i and all she can hear is her island being bombed. There were 120+ comments expressing sympathy, solidarity, and statements such as, “I was one of them in the 80’s being in the army NG field artillery. I am ashamed of myself not knowing any better back then. I’m born and raised on Oahu.” There were 170+ shares and 1,350+ like’s on this Instagram post as of May 28th, 2024. Pōhakuloa’s impact is much farther than 4 miles. This EIS is distorting the lived experiences of those affected by Army practices.</p>	
Shantee Brown		<p>Relevant Federal and State department members made public comments in the 2022 draft EIS questioning the process and/or legality of the EIS. In my opinion, the Army’s revisions and response in 2024 to those concerns do not show meaningful improvement.</p>	<p>NEPA and HEPA require responses to substantive comments. Section 1.6.2 notes that, in determining whether a comment is substantive, the EIS preparer “ . . . shall consider the validity, significance and relevance of the comment to the scope, analysis or process of the EIS (HAR Section 11-200.2-26[a]).” For this EIS, comments that help refine the Proposed Action or alternatives; identify specific resource analysis to be conducted in the EIS (e.g., cultural resources, biological resources, hazardous waste); and/or recommend technical data, specific impacts or mitigation measures were considered substantive. Statements considered to not be substantive were general comments with no specific information, such as those that stated preferences for or against the Proposed Action, military, or Army in Hawai‘i.</p>
Shantee Brown		<p>The EIS is also incomplete because it looks only at the “State controlled lands” and not the impact areas, which are littered with munitions debris + Unexploded Ordinances launched from the State controlled lands. Artillery training from the state controlled lands continue to aerosolize the debris on federal controlled lands. An EIS for an airport or landfill would need to include ALL heavily</p>	<p>Section 3.5.3 states that the region of influence for hazardous substances and hazardous wastes includes the impact area due to the firing of military munitions from the State-owned land into the impact area. Section 3.5.6 evaluates the potential impacts from continuation of ongoing activities within the State-owned land, including impacts to the impact area. Section 3.5.2 revised to add</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>impacted surrounding areas. This EIS does not take responsibility for the heaviest impact of the firing range. UXO is noted in the EIS as the reason for the lack of containment for the Leilani fire of 2022, yet they have never cleaned UXO in the Impact Area in 60+ years. Uncontrolled fires from the Impact Zone have the potential to cause catastrophic loss of life down the mountain. This EIS makes it clear that the Army doesn't intend to change its practices. Extra training for soldiers and fire breaks doesn't cancel the risks of having an uncontrollable + heavily contaminated tract of land in the most fire prone part of our island. This is a reckless use of our small island home.</p>	<p>the definition of operational ranges. Section 2.1 states that after expiration of the current lease, the Army would follow federal law and regulations to determine how and when cleanup and restoration activities for hazardous substances and MEC within the State-owned land not retained would occur under the CERCLA process. Section 3.5.6 revised to clarify that following completion of lease compliance actions and cleanup and restoration activities, the Army would remain responsible for disposing of any MEC that is incidentally found on the State-owned land not retained due to the DoD's live-fire military training at PTA.</p>
Shantee Brown		<p>The Leilani fire reached beyond PTA borders burning 12,458 acres. The Army's updated policies in the BO's of 2003, 2008, and 2013 did not prevent losing 50% of Pu'u Anahulu Game Management 'ōhi'a/endemic forest or the burning of 5,254 acres of threatened and endangered species habitat in PTA. There have been 800+ fires during their lease, that we know of since records from before 2012 have been lost. All of PTA is classified as a conservation district under the State's 1961 Land Use Law. It would therefore stand to reason that a future lease agreement or purchase from the State would be unlawful, since military activity on conservation land is not legal.</p>	<p>Wildland fire analysis in Section 3.3.6 has been revised. Mitigation measures for additional wildland fire protection; including an ungulate impact assessment have been added to the Mitigation Measures subsection.</p>
Shantee Brown		<p>I have additional concerns for the wellbeing of military members as I did not see a section for the impacts on soldiers from repeated blasts. Many groups have been sounding the alarm on risk factors for troops, such as the veteran founded HunterSeven Foundation which has been bringing awareness for non-combat veterans with debilitating illnesses caused by training and hazards on base. Linked below is a recent article they shared from the New York Times on brain injury in mortar soldiers. This is the time for the Army to take responsibility for all impacts and to resolve long standing health concerns. Signs of Brain Injury in Mortar Soldiers: 'Guys Are Getting Destroyed' Soldiers exposed to thousands of low-level blasts from firing weapons like mortars say that they wind up with debilitating symptoms of traumatic brain injury —</p>	<p>Section 3.16.2 discusses explosive safety regulations, standards, and standard operating procedures the Army adheres to at PTA. The Human Health and Safety analysis in Section 3.16 considers hazards associated with actions on the State-owned land that could affect PTA personnel and the public.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		but no diagnosis. Published May 2, 2024 Updated May 3, 2024 The Army Sees Mortars as Safe. Troops Report Signs of Brain Injury. - The New York Times (nytimes.com)	
Shantee Brown		Since the first Draft EIS in 2022, we have seen worst case scenario type outcomes related to wildfires + destruction of native habitat. The real world impacts of Pōhakuloa and lack of responsibility taken by the Army are not reflected in this second draft EIS. Residents spoke of our questions and concerns being ignored at the recent public comment meetings. I've included some formal comments I think have not been adequately addressed.	Wildland fire analysis in Section 3.3.6 has been revised. Mitigation measures for additional wildland fire protection; including an ungulate impact assessment have been added to the Mitigation Measures subsection.
Shantee Brown		“The state documents said the Army’s draft EIS does not meet requirements and has major gaps. Military use that involves maneuvers, ammunition, artillery and mortar systems, depleted uranium, explosives, firing points, hazardous materials and waste, live fire, unexploded ordnance, and weapons systems do not appear to be consistent with the Conservation District,” said the DLNR’s Office of Conservation and Coastal Land, in the June 7 document. The OCCL was alarmed at the number of previous dump sites on the state-leased land. It is inappropriate to conduct this type of warfare practice upon Conservation District land adjacent to areas designated as critical habitat for the palila; and a recreational campground for the people of Hawaii.” <a href="https://www.hawaiinewsnow.com/2022/08/16/state-land-department-has-scathing-surprising-comments-armys-training-pohakuloa/?outputType=amp">https://www.hawaiinewsnow.com/2022/08/16/state-land-department-has-scathing-surprising-comments-armys-training-pohakuloa/?outputType=amp</a>	Compliance with HAR Chapter 13-5, Conservation District, has been revised and is discussed in Sections 1.4.2 and 5.3.2. Sections 1.4.2, 3.2, and 5.3.2 have also been revised to make clear that for analysis purposes, the EIS assumes BLNR would establish a special subzone in the conservation district through a rule amendment that allows for military training use.
Elena L. Bryant	Earthjustice	The EIS fails to identify a proper baseline for meaningful analysis of impacts of the Proposed Action. In assessing the potential impacts of continued military use of State-owned lands, the EIS indicates that “[f]or most resources, the impacts of past actions are now part of existing conditions” (EIS at 4-2), and “[e]xisting conditions are based on all ongoing activities to date, including current activities and existing management measures.” (EIS at 3-2.) This is an inappropriate baseline to consider environmental impacts of the Proposed Action for two reasons. First, by assessing the impacts of continued military use in an already degraded	The Proposed Action is a real estate action (i.e., administrative action) that would enable the continuation of ongoing activities on the State-owned land. The Proposed Action does not include construction, modernization, or changes in training activities, which are covered under separate NEPA analyses. Mitigation measures and BMPs resulting from prior NEPA are ongoing, to include environmental monitoring and conservation activities. Any such changes to future ongoing activities would be subject to separate, future NEPA and HEPA analyses, as applicable.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>environment, the EIS’s analysis of impacts completely disregards the significant direct, indirect, and cumulative impacts that decades of military use have had on cultural and environmental resources in the project area. Second, this skewed baseline ignores that under the existing lease, all military uses will cease as of the August 16, 2029 lease termination date. Proper environmental review must consider the impacts of renewing military uses that would otherwise terminate, also taking into consideration the anticipated beneficial impacts of the Army’s obligation to conduct cleanup and restoration activities of former training areas not retained, such as reforestation, removal of unexploded munitions and by-products, and weapons decommissioning. (See EIS at ES-12; Appendix F.)</p>	<p>The baseline for analysis considers all prior and current ongoing activities, environmental monitoring and conservation activities.</p> <p>Section 4.3 discusses the combined impact of past, present, and reasonably foreseeable future actions.</p>
Elena L. Bryant	Earthjustice	<p>The EIS’s proposed land retention methods are not consistent with the State’s public trust duties or existing law.</p> <p>The EIS contemplates two methods for attaining a land interest that would allow the continued use of State-owned lands at PTA for military training activities—a land exchange and an amendment to the state conservation district rules. (See EIS at ES-7, 2-24, 4-9, 5-1.) Neither of the land retention methods proposed in the EIS are compatible with the State’s obligation as trustee of the public lands trust or existing law.</p>	<p>Section 2.3 states that Army Regulation 405-10 authorized estates for Army retention of non-federal government-owned land include fee simple title, lease, easement, and license. The EIS analyzes retention via fee simple title and lease because easement would have the same impacts as lease and license does not meet the Proposed Action purpose and need.</p> <p>Section 1.5.2 describes the State decisions, including the real property estate(s) and methods(s) that would be used to allow Army retention of the State-owned land.</p>
Elena L. Bryant	Earthjustice	<p>Proposed Land Exchange. The EIS proposes a land exchange between the Army and the State of Hawai’i as one potential way to attain a land interest that would allow the continued use of State-owned lands at PTA for military uses. (EIS at ES-12.) The three tracts of State-owned land contained within PTA are ceded lands. See <i>Ching v. Case</i>, 145 Hawai’i 148, 152 (2019). Section 5(f) of the Admission Act imposes a trust upon these lands and appoints the State as the trustee. See Pub. L. 86-3 (1959). “The most basic aspect of the State’s trust duties is the obligation to protect and maintain the trust property and regulate its use. . . . The trustee is under a duty to the beneficiary to use reasonable care and skill to preserve the trust property.” <i>Ching</i>, 145 Hawai’i at 170 (cleaned up). The alienation of any public trust lands through a land</p>	<p>The EIS does not propose a land exchange. Rather, it notes that land exchange has been identified as a potential process to use during land retention negotiations, which would occur after the Record of Decision is published. Environmental impacts from the Proposed Action (Army retention of State-owned land at PTA) are analyzed under lease and fee simple title as discussed in Section 2.3. Fee simple title represents the largest bundle of ownership rights possible in real property; and may be accomplished through a land exchange, which would require additional NEPA and HEPA analysis. The discussion of ceded lands under Section 3.2.4.1 has been revised to include that the Admission Act provides that lands retained by the United</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>exchange would result in the permanent loss of land, which is inconsistent with the State’s public trust duty to preserve trust property for the use and benefit of Native Hawaiians and the general public. Moreover, to the extent that the Army has surplus lands available for a potential land exchange, the United States government is already required to convey any surplus lands in its possession to the State of Hawai’i without monetary consideration, except for the fair market value of buildings and improvements, making these lands unavailable for a land exchange. See Pub. L. 88-233 (1963)</p>	<p>States for its own use could later be returned to the State if those lands are no longer needed for federal purposes.</p>
Elena L. Bryant	Earthjustice	<p>Amendment of Conservation District Rules.                      The EIS further proposes an amendment of the State’s conservation district rules as another potential way to attain a land interest that would allow the continued use of State-owned lands at PTA for military uses. The State-owned lands at PTA are regulated under State conservation district rules, Hawai’i Administrative Rules (“HAR”) chapter 13-5. The express purpose of the conservation district rules is “conserving, protecting, and preserving the important natural and cultural resources . . . through appropriate management and use to promote their long-term sustainability and the public health, safety, and welfare.” HAR § 13-5-1. Military uses are not included as allowable uses for any conservation district subzone and are therefore considered nonconforming. See HAR § 13-5-2 &amp; 13-5-22 through -25. The EIS suggests that incompatibility with conservation district rules could be addressed through the establishment of a new subzone within the conservation district that allows military uses. (EIS at 2-24, 4-9). Amending conservation district rules to accommodate the Army’s continued destruction of important natural and cultural resources contradicts the express purpose of the State conservation district rules. Such an amendment would be grossly inappropriate and would set a dangerous precedent of amending conservation district rules to legalize nonconforming uses.</p>	<p>Compliance with HAR Chapter 13-5, Conservation District, has been revised and is discussed in Sections 1.4.2 and 5.3.2. Sections 1.4.2, 3.2, and 5.3.2 have also been revised to make clear that for analysis purposes, the EIS assumes BLNR would establish a special subzone in the conservation district through a rule amendment that allows for military training use.</p> <p>Such a special subzone would be novel and represents a departure from current Conservation District uses.</p>
Elena L. Bryant	Earthjustice	<p>The EIS fails to disclose a method for determining the fair market value of the State-owned lands. The EIS claims that there will be “new,” “long-term,” and “beneficial impacts”</p>	<p>In the instance where a lease is the land retention estate for the State-owned land at PTA, the Army has stated that they would, in coordination with the State, provide a</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>on land tenure resulting from a new lease or sale of the State-owned land at PTA, which would be negotiated at “equitable, fair market value” and would generate revenue that would be used to fund State programs that benefit Native Hawaiians and other public programs. (EIS at 3-22, 3- 25.) The EIS, however, is silent as to how “fair market value” would be determined. Given the extremely unique nature of these lands, determining “fair market value” would be extremely complex and would need to take into consideration, among other things, the intrinsic cultural and ecological significance of these lands, any potential loss of value due to historical contamination and hazards created by decades of military use, and the foreclosure of future uses. Without a method for determining the fair market value of State-owned lands at PTA that considers these and other considerations, the EIS’s claims that a new lease or sale would provide beneficial impacts is unsupported and purely speculative</p>	<p>fair-market value for the leased State-owned land. Determination of fair market value is outside the scope of this EIS. The EIS has been revised in Section 2.3 and Appendix H to add the assumption that a new lease would be negotiated at an equitable, fair market value with the State. Land retention negotiations, including compensation for use of the State-owned land, would be initiated following completion of the NEPA/HEPA process.</p>
Elena L. Bryant	Earthjustice	<p>The EIS’s proposed mitigation measures are insufficient to address significant adverse impacts to historic and cultural resources and cultural practices.</p> <p>Both NEPA and HEPA require a discussion of measures to mitigate, avoid, minimize, or reduce adverse environmental impacts. See 40 C.F.R. §1502.16(a)(9); HAR § 11-200.1-24(p). HEPA further provides that a draft EIS “shall include, where possible, specific reference to the timing of each step proposed to be taken in any mitigation process . . . and what other provisions are proposed to ensure that the mitigation measures will in fact be taken in the event the action is implemented.” HAR § 11-200.1-24(p). Here, the EIS identifies continued, long-term, significant, adverse impacts on Native Hawaiian communities and cultural practices due to access limitations resulting from ongoing military uses but does not propose any concrete steps to ensure mitigation measures will actually be implemented. (EIS at 3-277-279, 3-286-287.) Apart from a vague proposal to “formalize a cultural access request process” and “explore options to provide unlimited cultural access to specific locations,” (EIS at 3-294, 3-296), the EIS’s discussion of mitigation</p>	<p>Such a special subzone would be novel and represents a departure from current Conservation District uses.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>measures does little to ensure steps will be taken to mitigate the significant adverse impacts on cultural practices. The Cultural Impact Assessment further indicates that although the Army has an existing access policy, it is largely ineffective to ensure adequate cultural access. (See Appendix I at 82-83.)</p>	
Elena L. Bryant	Earthjustice	<p>The EIS fails to properly address the cumulative impacts of the Proposed Action. Environmental review documents are required to identify and analyze all impacts of a proposed action, including cumulative impacts. See 40 C.F.R. §§ 1502.16 (requiring the disclosure of environmental impacts of a proposed action); 1508.1 (defining impacts to include cumulative impacts); HAR § 11-200.1-24. “Cumulative effects” is defined as “effects on the environment that result from the incremental effects of the action when added to the effects of other past, present, and reasonably foreseeable actions[.]” 40 C.F.R. § 1508.1(g)(3) (emphasis added); see also HAR § 11-200.1-2 (similarly defining cumulative impacts). The EIS states that 4 “the impacts of past actions are a part of existing conditions; therefore, the timeframe for potential cumulative impact contributions from present and reasonably foreseeable actions addressed in this analysis begins in the present and has no defined end date.” (EIS at ES-11.) This methodology for assessing cumulative impacts improperly excludes the significant environmental impact that six decades of military use has had on the project area, including the cumulative impacts on biological and cultural resources and the accumulation of hazardous and toxic materials and wastes. The EIS goes on to state that for most of the resource areas analyzed, cumulative impacts “were found to be less than significant.” (EIS at ES-11.) By completely ignoring the impacts of past military uses, including the historical and ongoing contamination of lands and waters by military activities on State-owned land and in neighboring federally controlled lands, the EIS fails to meaningfully disclose and analyze the cumulative impacts of continued military uses at PTA</p>	<p>Chapter 4, Cumulative Impacts, provides an analysis of the cumulative impacts of the Proposed Action and lease compliance actions with past, present, and reasonably foreseeable future actions for all resource areas. Section 4.1 revised to state that past actions are actions from the beginning of military activity at PTA to the present time and are captured in the existing conditions analysis of each resource area.</p>
Elena L. Bryant	Earthjustice	<p>Dear Mr. Overton: Earthjustice submits these comments in response to the</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>April 19, 2024 solicitation for public comment on the Army Training Land Retention at Pōhakuloa Training Area Second Draft Environmental Impact Statement (“EIS”). The Earthjustice Mid-Pacific Office has been involved in environmental review processes and litigation related to the Pōhakuloa Training Area (“PTA”) for over two decades and has raised serious concerns about the manner in which the Army conducts activities in these culturally and environmentally sensitive areas. Our office has been watching the development and disclosure of details related to the Army’s planned land retention efforts with growing concern. Earthjustice submits these comments to raise various concerns related to the Army’s proposed land retention action to support continued military training at PTA (“Proposed Action”).</p>	
Elena L. Bryant	Earthjustice	<p>Conclusion            In sum, Earthjustice has serious concerns about the EIS’s failure to fully disclose the direct, indirect, and cumulative impacts of the Proposed Action and to identify mitigation measures to be implemented. The Army’s proposed land retention action has the potential for lasting impacts on present and future generations and necessitates full and meaningful analysis of impacts, alternatives, and mitigation measures, and public participation in decision-making. We look forward to fuller disclosure of the project’s environmental impacts and proposed mitigation measures in future environmental review documents. If you would like to discuss these comments further or have any questions, please feel free to contact me by email at [redacted] or by telephone at [redacted].            Sincerely, Elena L. Bryant EARTHJUSTICE</p>	Please see General Response 1.
Bonniebrooke Bullock		<p>Aloha, This testimony is in favor of the No Action Alternative for the Pohakuloa Training Area Lease. I support:            * An end to the current lease so the army retains none of the 23,000 acres            * Hiring a third party consultant to evaluate all 132,000 acres the Army occupies            * An IMMEDIATE ceasefire on all conservation lands in the PTA            * That conservation lands are NOT allowed to change zone classifications            * Implement an immediate cleanup and</p>	Compliance with HAR Chapter 13-5, Conservation District, has been revised and is discussed in Sections 1.4.2 and 5.3.2. Sections 1.4.2, 3.2, and 5.3.2 have also been revised to make clear that for analysis purposes, the EIS assumes BLNR would establish a special subzone in the conservation district through a rule amendment that allows for military training use.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		restoration funded by the Army The Army’s destruction of Hawaiiis lands needs to stop. The US military has proven over and over that they are incapable stewards. Please confirm this testimony was recieved. Thank you for your time, Bonniebrooke Bullock Kapa’a, Kauai	
Alana Cabello		Do not renew their lease.	Please see General Response 1.
Eileen Cain		I am writing to oppose extending US military leases in Hawai’i, including Pohakuloa. Live-fire training in the Hawaiian islands needs to stop once and for all. It has been going on for far too long. We all need to be free from it. I support the “No Action Alternative” -- the Army’s lease needs to expire, and the Army needs to comply with terms of that lease by cleaning up these native lands, removing any ordinance or other forms of destruction caused by military use. Although I am haole (white/Caucasian), I take a strong anti-racist stance. The proposed terms of the lease would interfere with Kanaka Maoli (Native Hawaiians’) access to their cultural and religious practices. They should not have to ask permission to use their own land and its resources. Abuse of power is evident in the US Army’s proposal to extend its lease of these native lands. This is a power grab as well as a land grab, and it is a gross injustice. I am completely opposed to the Army's retention of control over Hawaiian lands and the use of those lands. Racist attitudes pervade this process of land occupation. Some people act as though they like the Native Hawaiians – as long as they stay in “their place,” and some white people and people of other races presume to dictate to the Native Hawaiians what “their place” is. This racist attitude holds that Native Hawaiians should just dance their hula and wear flowers and let everyone else make the decisions; they are expected to allow themselves to be co-opted and even participate in their own oppression. Such racial supremacy over indigenous people is arrogant and abusive, and it needs to stop. No one has the right to determine for the Native Hawaiians what their place is in society or in the islands, how much freedom they are “allowed” to have, what land they are “allowed” to have access to, or under what conditions they are “allowed” to have access to it. It is their land, not ours. Native	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>Hawaiians who exercise their freedoms are not the troublemakers. They did not cause this problem on the land. It is abuse of power that has created the trouble. The return of the 'āina to the native Hawaiians is long overdue. It is time to give the land back to the native people of these islands. Mahalo for your attention.</p>	
Lindsey Caldwell		<p>The US government and it's military has done nothing but prove time and time again that they are not proper stewards of these lands and should not be here at all. The bombing of native Hawaiian lands for the war games of the occupying government shouldn't have been denied as terms lease and full ownership. Red Hill, kahoolawe and the current destruction of pohakuloa (Hawaiian homes land) should be enough to terminate leases at PTA and the rest of Hawaii. It is clear that the "importance" of Hawaii for military strategy is the reason for the illegal overthrow and allowing the continued military occupancy further perpetuates this crime and the generational trauma that remains because of it. A'ole! Time to give them the eviction they deserve and return the Hawaiian lands to Hawaiian hands to it can heal, if that's even possible at this point.</p>	Please see General Response 1.
Joseph Camara		<p>Pohakuloa Training Area, including the State leased lands covered by this EIS, lies above the largest and most pristine aquifer in Hawaii, the Mauna Kea deep aquifer, or Kaohe. This resource could serve the freshwater need of the entire State if other sources are impacted. We know very little about the extent, recharge, and other factors that might make this resource vulnerable to contamination and other degradation.</p>	Please see General Response 1.
Joseph Camara		<p>The U.S. Military has had significant adverse impacts to the most important natural resource in Hawaii, water. The military bombing of Kahoolawe compromised the caprock and aquifer of island, diminishing its capacity to hold water and support life. The military contamination of the Puu Loa aquifer below the Red Hill fuel storage facility has compromised the safety of the drinking water for nearly 20% of Hawai'i's population. Neither of these impacts were foreseen or considered by Environmental Impact Statements, how can we trust the military to consider the</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
Joseph Camara		<p>needs of the people of Hawaii and steward our most precious resource?</p> <p>The military has already shown Hawaii how it cannot be trusted to care enough to consider their impact to our water and to steward our resources in the best interest of the people of Hawaii. The only way we can ensure that the military will not compromise Kaohe, is to end military use of the lands of Pohakuloa. Compromising this resource is simply not something the people of Hawaii can risk. The State of Hawaii, Department of Land and Natural Resources, who have a fiduciary responsibility to care for our resources, would be negligent in extending the military lease at Pohakuloa. Military training in Hawaii is not in the best interest of the people of Hawaii, the beneficiaries for whom DLNR holds the lands at Pohakuloa in trust. DLNR should consider the cumulative impacts of the military in Hawaii when considering the impact at Pohakuloa and act in the best interest of our water, lands and people by denying the extension of the military lease at Pohakuloa. Me ke aloha aina, Joseph Kualii Lindsey Camara</p>	Please see General Response 1.
Joseph Camara		<p>Aloha, As a person who loves Hawai'i and her people, I am firmly opposed to the Army's retention of any of the "State" lands at Pohakuloa. I support the "No Action Alternative" that would allow the lease to expire and require the Army to comply with all lease terms that include the clean-up of these lands. The other alternatives preserve a status quo in which Hawaiian land is bombed, burned, littered and polluted. The status quo is precisely what needs to be changed. Furthermore, the military impacts at Pohakuloa need to be considered in the context of the cumulative environmental impacts of the military in Hawaii, and not as a single program or single area. Hawaii has the most military installations per capita and more percentage of its land occupied by the military than any other State, by far. Many of these military facilities lie within critical habitat for endangered species, and the cumulative impact of these facilities are more than significant.</p>	<p>The region of influence for biological resources cumulative impacts is the same as that for the Proposed Action (see Section 3.3.3), which is correctly based on ecological boundaries rather than land type uses (e.g., military installations) or administrative boundaries (e.g., State of Hawai'i).</p> <p>Section 4.4, Biological Resources, was revised to include impacts on biological species from repeated wildland fires.</p>

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
Louise Canon		Put an end to the harmful destruction of the Hawaiian Islands. Enough is enough. This is some of the most important land in Hawaii and if you keep on destroying it, nothing can flourish except your wage on war. That is not for Hawaii	Please see General Response 1.
Jeffree Cary		Aloha, I am a Hawai'i resident and nursing student at UH Hilo. It is because of my deep appreciation of kanaka culture and history and dedication to human rights that I am writing you to voice my strongest possible opposition to the continued military occupation and desecration of Pohakuloa. Clean up your mess and leave!	Please see General Response 1.
Pua Case		I'm Pua Case. Mauna Kea is my mountain. And I, like many of us here, really didn't want to come here tonight. And I'll tell you why we didn't want to come here tonight, but we show up. I'm born and raised right here in Waimea. I'm born under the slopes of Mauna Kea. The first time I ever stood for something, I was a junior in high school and it was to protect the Kaho'olawe 'Ohana movement at that time, and I've been standing ever since. In 2019 I spent nine months on Mauna Kea sleeping in a tent or in a van protecting the water of our Mauna that flows from the Mauna right underneath Pohakuloa. And all I heard as I was sleeping -- I spent many a night thinking I was in a war zone because all we could hear was the bombing constantly as we were laying there. And the one thing about that is that you really get to know -- lying there, you can imagine the destruction, devastating as it is, to the land there. So I'm going to just back up now and say that I think when you folks introduce yourselves, what really gets me right from the very get go of it, is that we are lifelong for the most of us, lifelong Kānaka Maoli, or residents of this place. And yes, if you've just recently moved here, I count you in that, but for those of us who have lived here our whole lives, when you start -- and I would advise you maybe just to think about it. When you start by sitting there and telling us that you care about our culture or you care about good stewardship and that you are taking care of the land and the indigenous plans and the cultural sites, it's really hard hitting for us because I will say this, you cannot -- it's not even in our cultural	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>thinking that you can say you're taking care of something and destroy the area at the same time. There's no logical explanation that can be given and a developer, the military -- you all have the same verbiage. We come here to destroy, to construct, to desecrate, but at the same time, we're going to take good care of it as we're doing it. So I think when you start by saying that you're a good steward to us -- we grew up with this bombing. I wouldn't advise that you go into a Hawaiian community and start that way. Don't tell us that you're taking care of the 'āina as you destroy it. We have lived here all our lives. And I hope one day you leave. And I'll tell you why that is, because what you are bringing here is war. It's the vibration of war to a island that is aloha 'āina based. So every day that you are here -- for all the time that you are here, you are drawing attention -- a war vibration attention from the rest of the world right here to our Moku between the highest mountain in the world from the sea floor, our most sacred, to our deep waters, to our land bases, to our people and we are not a part of that and we are not contributing to that vibration, but because you are here, it almost makes it seem as we are. We are very against genocide. We're against war. We are against military actions that decimate people, destroy people, especially the indigenous people that this is happening to. And if you guys are bringing people here to train that are then going out and taking part in that kind of -- well, any kind of war activities, but especially that kind. I hope -- I wish that that were not happening, because in a way that almost makes us contribute to that because you trained here and then you went there and then hell happened. And we are -- we don't want to be party to that vibration, that frequency, that karma. And I know, because I've been in this for a long time, that this is a checking right here. You came here, you're going to walk out of here, you're going to say, oh, gosh, that meeting is over, now what we're going to do with those comments and what she said and you're going to be okay. You're going home. You're going to wherever the barracks and all that and you going to sleep. You're going to put your head on that pillow and</p>	

Responses to Second Draft EIS Comments

Commenter	Submitted By	Comment	Response
		<p>maybe some of the comments that we made tonight going to stay with you just a little bit and gnaw at you because you know why, you know it's right because you're guys not cleaning up that mess and it's horrid. But we -- why we never like come, because when we go home, right kanaka? It's not over for us, right. When we go home, we're going to be thinking about this meeting, right, Hawaiians? Right, residents? Right, local people of this place? We're going home and this going to bother us if we let it. So I try not -- I try to get to a place when I go home, I can sleep tonight, but what I'm going to be thinking about when you go sleep, I'm going to thinking about my ancestors who never had to feel that vibration way before us and our children, who I hope you're going to clean up before a couple more generations come here, and I hope they're not going to have to stand here and say the same things, not to you, because you guys come and go, but we're here every day when you come and go. And when we go home tonight, we're going to be feeling it, our na'au is not going to be in a place of a high vibration of aloha. We're going to be -- don't -- let's not -- let's not be in distress tonight, everybody. Let's not go home and let this take over us because we came to another meeting and another meeting, because this is only one issue. Pohakuloa is one issue, a very pivotal issue for us, of course, because we're talking about weapons and war and destruction and our health and our wellbeing. All of which seems to be getting bombed at the same time. You are doing way more than you think, but it's one issue in all the issues that we have to stand for for Hawaii. So tonight, I'm hoping that we all can go home and release this meeting and you understand why, unless they didn't know, more people don't come because they don't like to go home and think about, oh, no, they never going to leave, they're going to be bombing forever. You heard them say about the depleted uranium. What is that? And what if they crack the water table? What are we going to do about that? And then what if they get a land swap? And what if they get more acreage? That's the kind of things we think about when we go home. So tonight, I just going to say that I'm going to lay</p>	

**Responses to Second Draft EIS Comments**

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		<p>this in the kupuna's hands. I'm going to lay this back to Poliahu, Kukahau'ula, Mo'oinanea, Manaua, Kane, Kanaloa, Lono, and Ku. and I just going to say, just take it, because we still go to go sleep tonight and get up in the morning and we still have to function even though we came here. So this is a lot for us. This is a lot for us to come to a meeting like this. Say the same things over and over. You be on your way and then we got to go home and deal with that and how we're going to purge that because tomorrow is another day for us to stand for our 'āina. Aloha 'āina.</p>	
Laura Caverly		<p>Aloha, I am in favor of no action. Please do not continue leasing the land at Pohakuloa for military training. In spite of the declared good intentions of the army it is not possible to bomb land and simultaneously take good care of it. At the EIS meeting I recently attended the army personnel described Pohakuloa as being like nowhere else. This is true &gt;. For that very reason it should be preserved not used as a firing range. I have live in Ahualoa, Hawaii my whole life. hear the bombing from all the way on the other side of Mauna Kea. At its most extreme it rattles my windows. We have long been used without consideration for the toxicity that comes out of bombs and live fire. Please leave our land in peace.</p>	Please see General Response 1.
Laura Caverly		<p>It is time for the army to clean up and return the leased land. Mahalo for your consideration, Laura Caverly</p>	Please see General Response 1.
Laura Caverly		<p>In addition not nearly enough study has been done on the possibility of lead contamination of our aquifer.</p>	<p>The best available scientific data for groundwater and surface water quality was incorporated into this EIS. Groundwater and surface water quality are discussed in Section 3.9 of the EIS. Section 3.9.4.6 of the EIS documents the existing management measures utilized by the Army to protect water resources. The State Department of Health (DOH) Safe Drinking Water Branch (SDWB) monitors groundwater quality of aquifers as described in EIS Section 3.9. SDWB has released groundwater contamination maps for Hawai'i Island that</p>

Responses to Second Draft EIS Comments

Commenter	Submitted By	Comment	Response
			<p>show most contamination is along the eastern coast of the island. The DOH SDWB Environmental Health Portal can be accessed at <a href="https://eha-cloud.doh.hawaii.gov/sdwb/#!/home">https://eha-cloud.doh.hawaii.gov/sdwb/#!/home</a>Section 3.5 Hazardous Substances and Hazardous Wastes presents the existing conditions from current activities at PTA and notes that risk of contaminants mobilizing is not a concern as limited surface water and groundwater pathways on State-owned land pose minor potential impact to soil and groundwater quality. Section 3.5.4.11 describes the lack of mobilization of munitions constituents, including lead, within soil, groundwater, and surface water. Section 3.9.4.2 has been updated to include additional information from the Thomas (2019) report. A link to this report has been added to the PTA EIS website (<a href="https://home.army.mil/hawaii/ptaeis/project-home">https://home.army.mil/hawaii/ptaeis/project-home</a>) under the "Documents" tab.</p>
<p>Jacquelyn Chappel</p>		<p>I urge the state to discontinue military exercises at Pohakuloa.</p> <p>I have been hearing about the military's devastation of land at Pohakuloa for over a decade now. Hawaii is considered a special place by many people all over the world for its natural beauty--its trees, its birds, its oceans, its land.</p> <p>Inviting the military to conduct training on this precious land degrades the value of this land. Having the military conduct exercises on "conservation" land is even more insulting. The military does not belong anywhere *near conservation land.</p> <p>The US military has done enough to destroy Hawaii's land and resources, most notably with the Red Hill fuel leak, which has been an ongoing issue these past few years and which remains a threat to Hawaii's water source! That resource that allows us to live here!</p> <p>None of us can say what destruction the military training at Pohakuloa will result in. While an EIS report can certainly give us an idea, I am not confident that even an</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

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		<p>EIS report can itemize or predict the entirety of the environmental damage in the long run.</p> <p>The military training at Pohakuloa does not benefit the people of Hawaii. While it brings in revenue for the state, I encourage the state to discontinue this training at Pohakuloa.</p> <p>It is in the best long term interest of the people of Hawaii, the land, Oahu's resources.</p> <p>The US military has unfortunately given themselves a bad name through Red Hill and can no longer be trusted.</p> <p>Please discontinue US military training at Pohakuloa for any purpose and for any amount. If Governor Green can lower taxes, he can discontinue military training at Pohakuloa.</p> <p>Thank you!</p>	
Roger Christie		<p>Dear people, aloha. I'm grateful for the opportunity to strongly OPPOSE the state lease renewal of land to the military at Pohakuloa. Let's end the military occupation as soon as possible and restore the area. Thank you. May unexpected blessings and love keep coming to you and from you, Roger Christie</p>	Please see General Response 1.
Andrew Chun		<p>I am reaching out to express my staunch support for the U.S. Army's proposed retention of approximately 23,000 acres of state-owned land at Pōhakuloa Training Area (PTA) on Hawai'i Island. As a concerned citizen who acknowledges the pivotal role PTA fulfills, I firmly believe that the Army's retention of PTA is crucial for the safety of our island community. This is due to its significant contribution to supporting and training the Hawai'i National Guard, local first responders, and law enforcement, as well as its capability to respond to emergencies on Maunakea, Mauna Loa, and particularly along the Daniel K. Inouye Highway. Andrew Chun</p>	Please see General Response 1.
Brenda Chung		<p>As a Hilo resident, and a mother and a grandmother with grandchildren in the schools in Pahoia, Hawaii Island, I am very concerned about the health effect of the many toxins that have been used at Pohakuloa Training Area (PTA) in over 75 years of bombing and shelling by the military,</p>	<p>Sections 3.5.4.11 and 3.5.4.12 describe the lack of mobilization of munitions constituents, including depleted uranium. Section 3.5.4.12 discusses the various studies of depleted uranium at PTA, including archival research, site reconnaissance, radiological</p>

**Responses to Second Draft EIS Comments**

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		<p>especially the effect of Depleted Uranium (DU). DU oxide particles can be carried long distances in the wind, and when inhaled can cause a wide range of cancers, birth defects, and even genetic damage that can be passed to future generations. Whatever happens mauka comes makai - we are all downwinders of PTA. This is bad for everyone, but I am especially concerned for the well-being of the younger generations. Our keiki deserve better - they deserve to live without breathing in DU oxide and other toxins carried to them from PTA in the wind, unbeknownst to them and most of their elders. Please, for the keiki, do the right thing. I urge you to choose NOT to renew the PTA lease to the military, NOT to swap land for PTA. Simply RETUTN the land to the Kanaka Maoli, to whom it rightfully belongs. Thank you.</p>	<p>instrumentation, soil samples, air samples, and a health and risk assessment, and notes that surveys found no indication of depleted uranium within the State-owned land.</p> <p>Sections 3.5.4.12 and 3.6.4 note: The Army completed a 1-year airborne uranium monitoring program in 2009 to determine if the decay and vaporization of DU fragments has impacted local air quality. The monitoring program collected 210 air samples from three sites upwind and downwind of PTA to provide a basis of comparison. The monitoring program concluded that the DU had not impacted air quality at PTA or in the surrounding area because the total airborne uranium levels in the collected particulate matter samples were within the range of naturally occurring uranium in Hawaiian soils and rock and were several orders of magnitude below U.S. and international chemical and radiological health guidelines.</p>
Gail Clement		<p>Much public testimony has been received that the U.S. Army has not met the terms of the State Lease (public testimony and written comments, including the 1st and 2nd Draft EIS Public Meetings and April 12, 2024 DNLR Board Public Meeting). As evidenced by the Hawaii Supreme Court SCAP-18-0000432, August 23, 2019, decision (Supreme Court Decision), the DLNR's grossly inadequate and extremely limited inspections noted that the Lease Lands contained various military debris over many years. Further, the most recent 2023 DLNR inspection noted that in four of the five Sites inspected, spent shell casings were observed and one Site, Site 3, contained additional military debris. (GLS 3459 Inspection Report, August 16, 2023 Inspection). Clearly, even with many years of opportunity and high public concern, the U.S. Army has failed to achieve the minimal requirements of the 1964 State Lease.</p>	Please see General Response 1.
Gail Clement		<p>In case there is any doubt of the future outcome and condition of the Pohakuloa State Lands, the former Waikoloa Maneuver Area (WMA) serves as an alarming example. The Hawaii Department of Health March 2019 Plan, Executive Summary, Areawide Environmental Hazard</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

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		<p>Management Plan for the Waikoloa Maneuver Area Island of Hawaii, states, “The United States Marines used the Waikoloa Maneuver Area (WMA) from 1943 to 1946 for “live fire” training. Approximately 10% of the explosive ordnance failed to detonate, leaving a potential explosive hazard across at least 120,000 acres of land. Since 1946, the Department of Defense (DoD) conducted several investigations and cleanup activities in various locations throughout the WMA. Today, the United States Army Corp of Engineers (USACE) and the U.S. Army Garrison-Hawaii continue to investigate and remove UXO from the WMA. Completing this work in the entire WMA will cost approximately \$720,000,000. With the current annual budget of \$10,000,000, the cleanup process will take decades to complete. The USACE prioritizes its cleanup efforts based on areas that pose the greatest risk to local communities and those sites with the highest potential to contain UXO. In addition to these fiscal constraints, there are technological limitations in the detection and removal of UXO. Even after a cleanup is completed, today’s investigation and cleanup process cannot guarantee that UXO are no longer present. Consequently, despite the government’s best efforts to remove all the UXO, a continuing level of ‘residual risk’ related to UXO will remain in the WMA.” The WMA was only used for a period of approximately three years according to historic records; and the anticipated time for cleanup of UXO is at least 70 years with no guarantee all the UXO will be removed. Considering the decades of live fire training at PTA and the fact that 91% of the PTA Firing Points are located on State Lands, the DLNR must know that the State Lands are severely damaged; and the potential for their full, timely cleanup and restoration is miniscule. It is not logical to approve continue occupation of State Lands by the U.S. Army with the unsubstantiated belief that the Army will be good stewards.</p>	
Gail Clement		<p>ES.11 Existing Management Measures and Potential Mitigation Measures *The 2nd Draft EIS states the “Army would consider” additional Measures for Land Use, Historic and Cultural Resources and Cultural Practices, and</p>	<p>Air quality and noise analyses are presented in Sections 3.6 and 3.7, respectively.</p> <p>The phasing, timing, and description of mitigation</p>

**Responses to Second Draft EIS Comments**

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		<p>Human Health and Safety. This language is vague and completely unacceptable. The Army should be specific and definitive about what Measures will be implemented. This comment applies to the words, "Army would consider" found anywhere within the 2nd Draft EIS. *Other impacts to Human Health and Safety such as air quality (dust, pollutants) and noise should be considered.</p>	<p>measures to address significant adverse impacts have been included in the Final EIS.</p>
<p>Gail Clement</p>		<p>3.5.4 Existing Conditions The 2nd Draft EIS states, "The ECOP concluded that the contaminants detected in site soils [i.e., antimony, arsenic, cobalt, copper, iron, 1-methylnaphthalene, lead, manganese, naphthalene, selenium, silver, total petroleum hydrocarbons (TPH) as diesel range organics (DRO) and residual range organics, and zirconium] have a low likelihood to become mobilized off-site due to the low rainfall in the area, lack of streams, and absence of a developed drainage system across the State-owned land. This is absurd. Sheet flow and ephemeral drainages provide pathways for contaminant migration of all contaminants detected in PTA soils. And as evidenced by the inclusion of sediment sampling for its DU License (see below), the Army and the Nuclear Regulatory Commission recognize this contaminant migration pathway for DU. 3.5.4.12 Radioactive Materials Under the Army's Nuclear Regulatory Commission License, the Army conducts quarterly sediment sampling within an ephemeral stream to detect any off-installation migration of DU. A single ephemeral stream is insufficient to assess impacts from the extensive areas impacted by DU. No other routine environmental monitoring for DU is conducted. Air transport of DU-contaminated particulates is another potential pathway for off-installation migration. Routine air monitoring should also be conducted to ensure off-installation DU migration is not occurring due to contaminated airborne particulates.</p>	<p>Sections 3.5.4.11 and 3.5.4.12 describe the lack of mobilization of munitions constituents, including depleted uranium, within soil, groundwater, and surface water. The text notes that risk of contaminants mobilizing is not a concern as limited surface water and groundwater pathways on the State-owned land pose minor potential impact to soil and groundwater quality. The best available scientific data for groundwater and surface water quality was incorporated into this EIS. Section 3.9.4.6 documents the existing management measures used by the Army to protect water resources. The State Department of Health (DOH) Safe Drinking Water Branch (SDWB) monitors groundwater quality of aquifers as described in Section 3.9. The DOH SDWB has released groundwater contamination maps for Hawai'i Island that show most contamination is along the eastern coast of the island. The DOH SDWB Environmental Health Portal is available at <a href="https://eha-cloud.doh.hawaii.gov/sdwb/#!/home">https://eha-cloud.doh.hawaii.gov/sdwb/#!/home</a>. Per Section 3.5.4.12, the purpose of the quarterly sediment sampling is to detect off-installation migration of depleted uranium and sampling is performed in accordance with the site-specific Environmental Radiation Monitoring Plan for PTA. To determine the frequency and locations for sediment sampling, that plan considered the lack of surface water features, low rainfall, porous soils, lava substrates, lack of groundwater wells near the depleted uranium impact locations, and great depth to groundwater. None of the sediment samples have detected total/isotopic uranium above the 3.0 ratio identified in the Environmental Radiation Monitoring Plan. The sampling locations and analytical design in the NRC-approved Safety and Environmental Radiation</p>

**Responses to Second Draft EIS Comments**

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			Monitoring plans are beyond the scope of the EIS. Sections 3.5.4.12 and 3.6.4 contain a discussion on depleted uranium and the Army's 2009 air quality monitoring program, which concluded that depleted uranium had not impacted air quality at PTA or in the surrounding area.
Gail Clement		ES. 12 Incomplete Information / Unresolved Issues *The Army states, "Lease compliance actions for a new lease or easement are unknown but are assumed to be the same as the current lease" with a few exceptions listed. The assumption that the absolutely inadequate compliance actions in the 1964 lease would be used for a new lease is completely unrealistic. The DLNR would be negligent if it did not require additional compliance actions that incorporate current federal and State laws, regulations and policies governing military activities into a new lease. And based on the Army's record of contamination and inadequate cleanups, at a minimum, any new lease should include the requirement for ongoing, routine cleanup of all contamination caused by the Army, rather than allowing contamination to remain until the expiration of the lease.	Future lease conditions text in Sections ES.12, 2.1, 2.3, 3.1.3.1, and 5.2 and Appendix H revised as follows: 1. Text noting that future lease conditions would be the same as the current lease changed to similar to the current lease. 2. Text added to note future lease conditions may include references to state and federal regulations in existence at the time of a new lease or easement. (Note that adherence to future state and federal regulations under a new lease or easement is required regardless of any future lease conditions, and that the EIS cannot precisely analyze potential impacts associated with future regulations because future regulations are unknown.) 3. Text added to note the State may revise or add lease conditions to a new lease based on the State's standard lease conditions in existence at the time of a new lease; however, the EIS cannot precisely analyze potential impacts associated with revised or new lease conditions because those future lease conditions are unknown.
Evelyn Clouse		Protect the land	Please see General Response 1.
Jackson Coley		I will keep this relatively short and simple, I am opposed to the U.S. armed forces using Pohakuloa for any purposes. I grew up on Big Island and it was depressing as hell receiving warnings in school about UXO because the military fails to properly maintain any of their training grounds across Hawai'i. The military has never done anything good for Hawaii and they don't deserve to be here. Also, if you see any Navy guys, tell them to un-fuck Red Hill ASAP.	Please see General Response 1.
Kim Compoc		I write this letter in strong support for the "No Action Alternative" re: the Pōhakuloa Army lease. The way the military has treated Pōhakuloa is a total disgrace. As Circuit Court Judge Gary Chang declared in his 2018 ruling, the Hawai'i Department of Land and Natural Resources	Please see General Response 1.

**Responses to Second Draft EIS Comments**

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		<p>"breached its trust duty to mālama 'āina with respect to the lands the state leases to the U.S. Army." I see no evidence that anything has changed since that time. The Army should be apologizing to the people of Hawai'i but instead, it wants to inflict more harm. The environmental hazards due to aerosolized depleted uranium in Pōhakuloa alone is reason enough to cancel this lease, but of course, the list of crimes against the land, the water, and the people is very long. You cannot fool the public with promises of "national security," as we can see this narrative does not include ordinary people's needs for genuine security. The catastrophe at Red Hill made that very clear. We see your agenda for what it is: perpetual land/water grabs in Hawai'i and perpetual imperialist war abroad to secure endless profits for the military industrial complex. Native Hawaiians are not the only ones who are upset. People around the world are educating themselves on all the harm the military has done in Hawai'i, and why none of the leases should be renewed in 2029. In 2022, AJ+ released this important documentary, "How the Army got to bomb Hawai'i for \$1" which has over 67,000 views. We all want you out of Hawai'i, out of the Pacific, out of the Middle East, out of our mountains and oceans. This Army lease at Pōhakuloa should never be renewed. The Army must admit to its crimes and begin the decades-long task of cleaning up the mess it has made.</p>	
Amber Coppings		<p>Aloha, my name is Amber Coppings and I live in Honolulu. I am writing in opposition to the Army's Proposed Action to continue their retention of approximately 22,750 acres of State-leased lands once the lease expires in 2029, either through a new lease or through purchase. I am in full support of the No Action Alternative, under which the State lands will be relinquished back to the State. Below, I outline several key points of concern pertaining to various sections in the draft EIS.</p>	Please see General Response 1.
Amber Coppings		<p>The U.S. military has built a bad reputation of not following through on promises on use, management, or clean up of areas used for their purposes. In conclusion, I support the No Action Alternative by which the State-leased lands will return to the State in 2029. Throughout</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

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		<p>the second draft EIS, it is made abundantly clear that the No Action Alternative consistently results in significant, beneficial impacts, as opposed to the numerous adverse impacts that would result from Alternative 1. The Army has mistreated the lands of Pōhakuloa, threatening human health and the health of our greater environment. The Army needs to clean up the State-leased lands and return them in better condition. I implore the State to not consider re-leasing these lands or selling these lands to the Army in the future. Mahalo for your time.</p>	
Amber Coppings		<p>3.9 Water ResourcesThe Pōhakuloa region is a vital watershed. As stated in the draft EIS, "the uniqueness [of this groundwater] is 'irreplaceable'; and the vulnerability to contamination is classified as 'High.'" Given the potential pollutants listed in section 3.5, I am concerned that these and other pollutants could infiltrate the aquifer. While the groundwater at Pōhakuloa is not directly consumed, all water within our porous, volcanic island is interconnected, eventually reaching water sources that are consumed as well as flowing out to the sea. Lead is a particular concern, as no amount of lead is safe for biological consumption. As stated in section 3.5, "Lead is the primary COC from small caliber munitions." The draft EIS further states that the use of military munitions pose a potential threat to soil and groundwater quality. The draft EIS mentions that soldiers are required to collect spent casings, but bullet casings are known to litter the landscape.</p>	<p>The best available scientific data for groundwater and surface water quality was incorporated into this EIS. Groundwater and surface water quality are discussed in Section 3.9 of the EIS. Section 3.9.4.6 of the EIS documents the existing management measures utilized by the Army to protect water resources. The State Department of Health (DOH) Safe Drinking Water Branch (SDWB) monitors groundwater quality of aquifers as described in EIS Section 3.9. SDWB has released groundwater contamination maps for Hawai'i Island that show most contamination is along the eastern coast of the island. The DOH SDWB Environmental Health Portal can be accessed at <a href="https://eha-cloud.doh.hawaii.gov/sdwb/#!/home">https://eha-cloud.doh.hawaii.gov/sdwb/#!/home</a>Section 3.5 Hazardous Substances and Hazardous Wastes presents the existing conditions from current activities at PTA and notes that risk of contaminants mobilizing is not a concern as limited surface water and groundwater pathways on the State-owned land pose minor potential impact to soil and groundwater quality. Section 3.5.4.11 describes the lack of mobilization of munitions constituents, including lead, within soil, groundwater, and surface water.</p>
Rebekah Cryderman		<p>It is so disappointing that an extension of lease is even being considered. There should absolutely be no extension of a lease for the US military on these lands. They should also be forced to clean up the mess they've made. The future is 'āina, not protecting the military from being accountable to its actions. These lands are worth so much</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>more than the meager price you could ever put on them. Please reconsider a lease of any kind on these lands.</p>	
<p>Rebekah Cryderman</p>		<p>Bombs will always have a negative environmental impact. There are cultural and environmental resources being actively destroyed by the occupation of military forces on these islands and at Pohakuloa.</p>	<p>Please see General Response 1.</p>
<p>Sarai Devi Dasi</p>		<p>To whom it may concern,                      I strongly urge you to reconsider the retention of army training land at Pohakuloa Training Area. The original lease was at an extremely low price, and was not ethical. It still is not ethical. Native Hawaiians, whose stolen land is being used as a training area, have repeatedly expressed that they wish the land to be returned to them. Not only is the land being used to train an army which is to blame for many harmful colonial practices, but the training area is also negatively impacting the island of Hawaii and the surrounding habitat. The negative ecological ramifications are serious and need to be addressed. The island of Hawaii is only so big, and to use part of it as a military training facility seems to be extravagant and unnecessary, especially considering the land could be used to house native Hawaiians, many of whom are facing extremely high rents and are forced to leave their homelands. I sincerely hope that you do not move forwards with the retention of the land, and that you give it back to its original keepers.                      Sincerely,                      Sarai Devi Dasi</p>	<p>Please see General Response 1.</p>
<p>Rosella DeAlva-Guerrero</p>		<p>Hello, Here are the following demands we are asking for: - Proceed with the no-action alternative which will end their current lease on the 23000 acres with no retention options -Hire a third party consultant to evaluate the environmental impacts on all 132000 acres that they occupy -implement an immediate ceasefire on all conservation lands in PTA and that they not be allowed to change zone classifications -implement an immediate clean up and restoration efforts with the millions of dollars they are annually allotted. We need more care for the 'āina. Mahalo, Rosella DeAlva-Guerrero, MA. "My mission in life is not merely to survive, but to thrive; and to do so</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
Christopher Dean	Recycle Hawaii, Clean The Pacific	<p>with some passion, some compassion, some humor, and some style.” - Maya Angelou</p> <p>We are against all military operations at Pohakuloa. "Sustainable development" is an oxymoron. There's no such thing as sustainable development. When humans take land, all the other plants and animals have to leave that land. Take a look at Google Earth. Go ahead, I dare you. Humans have taken it all. We are a miniscule percentage of all animals species, one out of millions, yet we have taken the entire planet for ourselves. When will it end? I'll tell you when, it ends when the mass extinction event that is happening right now, gets to the point where life functions are unable to sustain themselves, and we're pretty damn close to that point right now. If you really want to protect Americans, you'll stop doing what you're doing.</p> <p>What's that? You say I don't understand the global threat stage? Oh, I do, believe me, I do. As someone with Ukrainian heritage, I understand. But you know what you don't understand? We live on a finite sphere. I'm sure someone taught you that at some point, but like all capitalists, you have completely blocked that fact from your mind. So answer this one question, what's your plan for laying claim to the last dregs of Earth's natural resources? Don't say warfare, because that is the end of all life on Earth immediately. Any other ideas? Ok, I have one. Tell the politicians in America what I've written down here and demand a global conference with China, Russia, India and everyone else, and tell them to talk about how we've all got to work together to share what we've got without any more logging, drilling, mining, fracking, building structures, and agriculture. No more spreading out. No more development.</p> <p>And for God's sake, GET SOME BIRTH CONTROL GOING!</p>	Please see General Response 1.
Mu Decedents		NEED - NEW TREATY with Hawaii - memorandum of understanding with the foreign occupying military. Law of the land. U.S. Supreme Court Hale vs Hinke (Jes Soil all land) mineral rights are in Allodial-Allodium tite-heirs-	Please see General Response 1.

**Responses to Second Draft EIS Comments**

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		<p>decendents of Hawaiian Kingdom NOT U.S. Fedral corp. US Code Article 28, section 3002, line 15 ????</p> <p>Corporation/district of columbia - the U.S. and State of Hawaii OWN NO land. Defective latitude and longitude in the leap in bounds jurisdiction of Pacific Island Nation. Officers agent, officials, employees of US citizenship "illegal migration" have NO bonifide authority to own land. Ommission by admitace by atouney general for foreign US and State criminality intention acts of fraud charges fired in internationi crimiminal courts and warrant for foreign and domestic employees officers agent interfering with cultural lifestyle practices and norm. US law art I7 Article 1 section 10.1. Bonifide land owners - heris mathew hoopili sir lewis leroy black observors n witnness collected evidence and interviews for ICC. "We will hold people accountable." They will be extridited and held at fort island penatenry - prison until hearing also other countries are willing to take are prisoner. In Hawaii also prison boat will be used just inside EET zone 12 miles to hold these criminals. All in order for return of land occupied by foreign government Art 28. 2029 coming up soon! Whats your kuamoo? Piko? Where you born here? What is the name of your leneal decendents. Where is your royal patent? LCA? Only giving by the King! Can grant. Palais des Nations Geneva, Switzerland, Memorandum. January 17, 1983 lawful qov't shut down. (Defective leases by US citizens) All leases to land are over 2029 foreign U.S. occupation will be address with leases you do not own "Jes soil" land US propoganda fraud reason arrest warrents will be issued to those us interfeir with Hawaiian people and subjects. Illegal commerce defective jurisdiction in latitude n longitude of Hawaiian Kingdom . US domestic law and state color of law color of law do not have jurisdiction union cards used by agents working for US fed and state and city and county courts. Will be addressed and crimes trasspasing war crime cultural genocide embezelment, treason will be used to full fullest extent of internationa law, Hawaii Kingdom law and the violation of US constition Article 1 Section 10.1 violation of "obligated clause. Hawaiiis defective legistlator and US</p>	

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>congressional delegates also will face criminal charges. Mazi Hirano, Brian Shauttz, Ed Case, Jill Takudd and past officers Tulsi, Kai Kahele. Registered bonified letters notorized and sent to international criminal courts with name, signatures, defective contracts. Evidence. For future prsecuion. State of Hawaii is a US foreign corpation subsidiary. The State of Hawaii owns no land any agents will be prosecuted for propoganda in are jurisdiction fraud - US realator association - FAA, etc. Collecting more evidence for court hearings in Geneva - ALL air land and sea = Hawaii Pacific Kingdom. Not U.S. of US subsidiary Hawaii fake state. *Illegal immigration *Violation of international commerce laws byu US Agents Extraditions are in order. Of obligation clause" titude-longitude uman rights war crimes defective contract! NO bonefide athourity heirs - descendent</p>	
<p>Lehuanani DeFranco</p>		<p>Aloha, in the FAQs, there is a line that says "Loss of this land would substantially impact the ability of USARHAW and other service components and local agencies to meet their training requirements ad mission of readiness." The other said of that is that the land has been lost according to Native Hawaiians. The loss of this land has ALREADY substantially impacted the ability of Native Hawaiians to meet their training requirements and mission of readiness to continue protecting and preserving this place that we all call home. Another quote: "The Army is mandated by Congress to preserve the peace and security of, and provide for the defense of, the United States, its commonwealths, and its territories; support national policies and implement national objectives; and overcome any nations responsible for aggressive acts that endanger the peace and security of the United States." How is the Army protecting their citizens in Hawai'i? The Army has made Hawai'i a strategic target for others to attack us. The Army has continued to bomb and destroy our landscape with a very poor "attempt" at cleaning up debris. This is not your priority and so it's difficult to see why you all should be allowed to continue holding this lease. Reading the Second EIS Draft, I'm struck by how your use of our history is so quick to say "yes, this was illegal but here we</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

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		<p>are". For people who are so sure they are "protecting our country and protecting our rights" you seem to be okay with trampling on the rights of others. You acknowledge the Nation of Hawai'i was overthrown but you don't mention the protest against it. You acknowledge the statehood vote but you don't mention the fact that there are supposed to be three options on that vote: 1. Statehood, 2. Stay a territory, 3. Return to Nationhood. That third option was NOT on the ballot and the manipulation of treating territories poorly pushed many people to vote for Statehood. Then you acknowledge Hawaiian Homelands and the fact that these lands are supposed to be held in trust for Native Hawaiian people. I do not understand the acknowledging that and saying "but oh well, the fake state illegally gave us the land and we will practice our war games there." Hawai'i is nothing without Native Hawaiians and every time you think you are working to protect, know that you are bombing land, bombing our homes and destroying all efforts to TRULY protect. I want to end this comment by thinking about your mother, your father, your children, your siblings, your church, your god. Think about all the people who you love and care for and now imagine their home and their customs being torn apart. I know there is a belief that you are protecting the US by using this land as for your training but in reality, you're destroying, you're sacrificing the people who live on this land for the benefit of "protection". We have had to live without for so long, for once do the right things and start to pull the military out. Even by shrinking down the amount of land. Please, do your job and finally protect.</p>	
Beth Roney deYoung		<p>I strongly support the extension of leases of the Pōhakuloa Training Area (PTA). This facility provides jobs, support for security and roads in the area. It is a very important employer on Hawaii Island. Maintaining PTA ensures we can continue protecting our environment and supporting our local economy. Thank you for considering my support. Sincerely, Beth Roney deYoung</p>	Please see General Response 1.
Christopher Diaz		Demilitarize Pohakuloa.	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
Thomas Kevin Kekoa Dolan-Ma		It is time, long overdue, that the US Army stop destroying the aina of Hawai'i. The impact of its dangerous practices are well known as are the suspicious tactics it uses to illegally occupy this territory. I do not support the US Armies occupation of Hawai'i on any of its islands.	Please see General Response 1.
Cyn Kauanuialeimaka Doyle		aloha mai kakou, o cyn kauanuialeimaka doyle kou inoa. o noho o lanihau, kona, motu o keawe au. First I want to make it absolutely clear that I am supporting the No Action Alternative - No retention of 'state' owned land after 2029. Clean up, pack up, leave. Go home already. As a reconnecting kanaka returning from diaspora it is incredibly disappointing that I must spend my free time protesting the continued occupation and desecration of my ohanas aina. But it's not surprising. You are one of many entities that has contributed to the displacement and death of my ohana- and thousands of others. I should be spending my time learning olelo, hula and oli, hala weaving, growing our traditional foods, caring for our tupuna and aina. Instead- I have to educate myself on the deception and hewa nature of the US military- and by association the BLNR. This is a foreign military base set up on Hawaiian Crown Lands, us Kanaka Oihi are the direct beneficiaries of this aina that you are continuing to desecrate with your bombs. All in the name of 'readiness'? Readiness to drop these bombs on other occupied nations and oppressed peoples? Aole to imperialism, aole to continue occupation. You are poisoning our water and our air with every munition you fire and bomb you drop. You are desecrating sacred sites including heiau and iwi tupuna. Hewa. The line of PTA being 'necessary' to defend the imperial core (aka the 'united' states of america) is just that- a line. A line you peddle to instill fear in people. You said the same about Kohemalalama o Kanaloa (Kahoolawe). It was necessary until you cracked the water table and went to PTA. You'll find other land to desecrate once you leave PTA. Although I wish you wouldn't. More and more people are waking up to your sinister existence. More and more people are waking up to the absolute destruction militarism and imperialism cause. I am requesting complete disclosure of all water tests done on	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>the well you drilled years ago. Where are they? Why are you still hauling water from Waimea? Where is the impact assessment on the water aquifer which sits beneath PTA? I am also requesting the BLNR hire a third party consultant to evaluate the environmental impacts on ALL 132,000 acres currently occupied. As well as an immediate ceasefire on all conservation lands in PTA- and that they not be allowed to change zone classifications. Also requesting an IMMEDIATE clean up and restoration effort with the millions of dollars you are annually allotted. We have said aole so many times. And we will keep coming back to tell you no as long as it takes. Leave PTA, Leave Hawaii, Leave Oceania. With absolutely no aloha, Cyn Kauanuialeimaka Doyle</p>	
Margaret Duka		<p>Please note that I stand with Kanaka in opposing the military occupation of Pōhakuloa. Please note that the environmental and cultural impact is too high. I urge a withdrawal and return of Pōhakuloa.</p>	<p>Please see General Response 1.</p>
patrick easterling		<p>I am against extending the lease in any form. The military has ruined much of Hawaii's environment, for instance Pearl Harbor was known as the breadbasket of O'ahu. Pohakuloa's military activities has ignited over 800 fires! Rare species were being bulldozed until the Sierra Club threatened suit!</p>	<p>Please see General Response 1.</p>
Patrick Easterling		<p>Hello. I'm Patrick Easterling from Hilo, Hawaii. And I -- I'm against extending the lease in any way, shape or form. 62 years ago, I was living in Saigon, Vietnam. My father was Chief Navy. Then we had to move quick because he told the Joint Chiefs that we were losing the war and we had to change strategy. So the Joint Chiefs in the Pentagon, McNamara, got rid of him, cashiered him. More recently, 2003, Thomas White secretary of the Army was fired. Shinseki was shut up and locked into a small room when they opposed the idiotic invasion of Iraq. I'm just saying this because while I know many officers like my father were honorable men, the military is not honorable. The military lies. They do whatever they want. And usually, it's -- well, in my lifetime, it's consistently been wars of imperialism, things that are looked back on as mistakes like, you know, bombing Laos</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>with more bombs that were -- than were dropped on Germany in World War II. That was quite a mistake. They're still being blown up by this children usually. But I question because things like the bulldozing of some of the 10 rare species was only stopped because the Sierra Club filed suit. It wasn't a volunteer. When you guys have your Pohakuloa day and you invite all the children up, to me it's like, you know, painting lipstick on a pig. The -- it's the -- it's going back to the depleted uranium. They -- we found out -- squeezed some of the truth out in 2008 that at least 2,000 rounds of depleted uranium were used for the nuclear training for the DV rocket program, where they were spotting shells, at least 2,000. And -- and who knows how many more? You know, we know there's, what, over 7 million bombs set off. And then we know that training for nuclear war has taken place and is likely still taking place at the PTA behind a wall of secrecy. And they're not going to tell us what's going on. But it has been confirmed that B-52 and B-2 stealth bombers fly monthly nonstop from Louisiana, Missouri, Guam, to bomb Pohakuloa and return home without ever touching down in Hawaii, except for their bombs. B-52 stealth bombers are now deployed from Hickam. One B-52 bomber is named Spirit of Hawaii. Thank you.</p>	
Harald Ebeling		<p>To Whom It May Concern</p> <p>I am writing in strong opposition to the US Army's proposed retention of the lease for the Pōhakuloa Training Area (PTA).</p> <p>While the US Army has argued that their decades-long (ab)use of the PTA (characterized by a total disregard for the environment) is lawful since the current Conservation District Zoning was not in effect at the beginning of the lease period, this zoning will most certainly be in effect when the lease terminates in 2029. It follows that any continuation of the current practices would be a violation of zoning regulations of unprecedented magnitude. Live-fire military exercises in a critical plant and animal habitat? Any consideration of a variance for such flagrant misuse</p>	<p>Compliance with HAR Chapter 13-5, Conservation District, has been revised and is discussed in Sections 1.4.2 and 5.3.2. Sections 1.4.2, 3.2, and 5.3.2 have also been revised to make clear that for analysis purposes, the EIS assumes BLNR would establish a special subzone in the conservation district through a rule amendment that allows for military training use.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>would be ludicrous.</p> <p>Anyone driving along the Saddle Road has seen the result of 60 years of relentless abuse of the land. The Army's proposals of Maximum Retention (22,750 acres) or Modified Retention (19,700 acres) are close to indistinguishable in their blatant disrespect for the environment. The only acceptable outcome is the "No Action Alternative": 0 (zero) acres once the current lease expires in 2029. Enough.</p> <p>Aloha, Harald Ebeling</p>	
Lila Edwards		<p>Aloha. My name is Lila Edwards. I'll make it quick. I'm here today to -- I want to contribute to this testimony on the behalf of children in Hawaii. I'm someone -- I'm not speaking on behalf of my company, but I'm someone who's been to every school in Hawaii, every room, looking at safety of buildings and also environmental air quality and things going on in Hawaii. And I went to the schools talk -- I've talked to over 200 custodians in Hawaii and I went to the school that was inundated with jet fuel. I know the environmental scientist that worked in the cleanup. And what I want to say is, as jet fuel was streaming through a elementary school on Oahu, it blew all the gaskets, exploded the toilets. There -- this -- the extent of poison is very real in the impact of military occupation and testing here in Hawaii. And it affects children, it affects schools. Army Corps of Engineers has been a big part of how schools were created here. There's a long history of neglect. And just so you know, directly from custodian's mouths to me, gaskets are still rotting away. There's still -- they can say that there's no jet fuel and there's a -- it impacts children. So I just want everyone -- I just want this to be on record that you really need to clean up. I -- I just want to get this on record, like, I'm against the extension of the lease. And there needs to be a focus on cleanup. The playground at Saddle Road is radioactive. These are places that house children all throughout Hawaii. And I want to be -- I want this on</p>	<p>The Army has no knowledge or records of any potential radioactive contamination at the Gilbert Kahele Recreation Area due to Army activities within the State-owned land. Releases of hazardous substances and hazardous wastes on O'ahu are outside the scope of the PTA EIS.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		testimony that you have not done a good job and I know. So thank you.	
Kurt Fevella		I strongly oppose the lease extension for the state owned 23,000 acres at the Pohakuloa Training Area (PTA) on Hawai'i Island and I call for the immediate cease fire of all bombing and artillery activities for the following reasons: Both the Federal and State governments have not conducted any comprehensive studies on what types of negative impacts the military bombing activities has had on the entire 132,000 acres included in the PTA and are having on the fresh water aquifer. Since 1964, the Department of Land and Natural Resources (DLNR) and Hawaii County have not reported any inspections of the fresh water aquifer and does not have a current conditions report. Today, the federal, DLNR, and Hawaii County cannot say for certain there is not and will not have any negative impacts to the aquifer. o As evident with Kaho`olawe and the Halawa aquifer on Oahu, Hawaii must play a much more assertive role in protecting our vital resources like water, land, endangered flora and fauna, cultural sites and practices, and ultimately its people. All bombing activities should cease and a comprehensive aquifer inspection and conditions report should be generated. An impacts analysis should be conducted, and a mitigation plan be developed and executed prior to lease expiration in 2029.	<p>The best available scientific data for groundwater and surface water quality was incorporated into this EIS. Groundwater and surface water quality are discussed in Section 3.9 of the EIS. Section 3.9.4.6 of the EIS documents the existing management measures utilized by the Army to protect water resources. The State Department of Health (DOH) Safe Drinking Water Branch (SDWB) monitors groundwater quality of aquifers as described in EIS Section 3.9. SDWB has released groundwater contamination maps for Hawai'i Island that show most contamination is along the eastern coast of the island. The DOH SDWB Environmental Health Portal can be accessed at <a href="https://eha-cloud.doh.hawaii.gov/sdwb/#!/home">https://eha-cloud.doh.hawaii.gov/sdwb/#!/home</a></p> <p>Section 3.9.4.2 has been updated to include additional information from the Thomas (2019) report. A link to this report has been added to the PTA EIS website (<a href="https://home.army.mil/hawaii/ptaeis/project-home">https://home.army.mil/hawaii/ptaeis/project-home</a>) under the "Documents" tab.</p>
Kurt Fevella		For the past 50 years, DLNR has failed to enforce the PTA lease requirements and provide oversight resulting in negative impacts to the endangered Palila honeycreeper bird and its habitat. To date, DLNR has not provided any comprehensive monitoring plan, clean-up plan, and there is no consistent practitioners oversight committee to ensure cultural sites and practices are being protected.	Please see General Response 1.
Kurt Fevella		The 2nd draft EIS reduces the amount of acreage from 22,750 acres to 19,700 acres, which includes all 11 miles of roadway access. Technically, the military only needs access to the 11 miles of roadway that connects to the federally owned lands and not the state-owned acreage.	<p>The State-owned land includes vital training areas that are necessary to meet ongoing training requirements.</p> <p>Section 2.2.5 describes Alternative 4, "Retention of Only Access, Utilities, and Infrastructure," and reasons why this alternative does not meet elements of the Army's purpose and need and does not fully meet screening</p>

**Responses to Second Draft EIS Comments**

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E. Kalani Flores		<p>And due respect to everyone, I'm going to be more than three minutes. Sorry about that but that's -- My name is E. Kalani Flores, representing the Flores-Case 'Ohana and I reside here in Pu'ukapu, Waimea. I was here last -- and two years ago to give an oral testimony. And you know when I came up here -- here -- here's my comments. It's -- my comments are on -- in volume II, page I-89, and this is what I said when I came the last time. I wasn't going to come tonight because we -- because we come to all these hearings and give testimony, and nothing ever comes of it, so why ever come. I'm just going to resubmit these comments again. In addition to that, besides my oral comments, I submitted written comments, nearly 40 pages, along with a -- it doesn't include attachments either and that was pages -- in -- in volume II, I-93. Going back to question, why even come. Yeah. You give your comments, you get some inadequate responses to the -- to our comments, it's just like a -- it's just -- you guys going through the process of checking off the box, like, oh, we have a hearing, scoping meetings, turn in comments, look at them, and cut and paste your responses to it. They're inadequate. They're inaccurate and inadequate. The responses to the comments that was previously submitted. I want you to document. I sent almost 40 pages of comments.</p>	<p>criteria 1, 2, 4, and 5. Consequently, it is not a reasonable alternative and is not carried forward for detailed analysis within the EIS.</p> <p>NEPA and HEPA require responses to substantive comments. Section 1.6.2 notes that, in determining whether a comment is substantive, the EIS preparer “. . . shall consider the validity, significance and relevance of the comment to the scope, analysis or process of the EIS (HAR Section 11-200.2-26[a]).” For this EIS, comments that help refine the Proposed Action or alternatives; identify specific resource analysis to be conducted in the EIS (e.g., cultural resources, biological resources, hazardous waste); and/or recommend technical data, specific impacts or mitigation measures were considered substantive. Statements considered to not be substantive were general comments with no specific information, such as those that stated preferences for or against the Proposed Action, military, or Army in Hawai'i.</p>
E. Kalani Flores		<p>Okay. That's the first thing. First all, I was going to kind of reiterate, I'm -- I'm -- I'm going to be real concise on -- so if I go over three minutes -- I'm going to be as concise as I can be, but it's basically reiterating what was previously in the -- in my written and oral comments the last time. The draft EIS is incomplete, inadequate, and deficient and fails to be in compliance with the National Environmental Policy Act and Hawaiian Environmental Policy Act, as well. It's also not in compliance with the National Historic Preservation Act as such. One of the things when you look at the -- the region of influence, you guys trying to reduce the -- not trying to -- you already reducing the region of</p>	<p>As noted in Section 1.4, HRS Chapter 6E compliance is separate from the EIS process. The Proposed Action is an administrative action; no new activities are proposed. The EIS relies on existing studies to present what is known of current conditions, and the full summary in contained in the Archaeological Literature Review (Appendix J).</p> <p>Section 3.4.2 of the EIS documents the NHPA consultation process that resulted in a 2018 programmatic agreement to resolve adverse effects at PTA from ongoing activities, and that separate Section</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>influence to just the state-owned lands. It's not, because when you -- when you look the process and you look at the laws, you're supposed to take a look at it entirety, not just those few acres, but how those acres relate to the rest of what's happening at Pohakuloa. So a comprehensive EIS has not been done and is inadequate as such. You guys haven't done section 108 -- excuse me. You haven't done section 106. You didn't do a section 106. You guys make reference that you did a section 106 to something else in 2018. You didn't do a section 106 to this. You guys are also not in compliance with this whole process here. Responses to comments, there were -- there were just cut and paste responses. Some of them were inaccurate. They -- they're not comprehensive in responses to our comments that were given.</p>	<p>106 consultation is also conducted for other activities that fall outside the parameters of the 2018 Section 106 PA for PTA.</p>
<p>E. Kalani Flores</p>		<p>Overall, the -- And some of the inadequacies in this project is the cultural impact assessment, referred to as a CIA. It's not comprehensive. In fact, this time around, you guys actually trimmed it down and it -- I did a -- a document in comparison with the last CIA and with this CIA, you guys like trimmed everything down, so it's -- it's not comprehensive. It's inadequate. It doesn't have sufficient information in this CIA. You guys should be making it more thorough, not trying to trim it down for your -- for this whole process. Also, the last time around, I did make an -- comments and I also contacted the contractor for the CIA. I sent two emails and I'm going to read part of my emails because I never got a response back. You see, you ask us for response to -- into this -- this process, but I never got a response back. Here is my second -- here is my second email. Aloha. I'm submitting -- I'm resubmitting comments previously emailed to your firm on June 2nd, 2022, pertaining to the CIA for the PTA ATR, see email below. I never heard back from anyone in your firm, whether you received these comments or not. We wish to be consulted regarding the CIA, preferably at Zoom meeting or face to face instead of the online survey form. I didn't hear anything back in June. I didn't hear anything back in December. Here we are again, back again. The CIA is -- it's -- the -- okay. The first CIA, had only one interview. This</p>	<p>The first draft CIA was revised to improve readability, focus analysis within the project area and broad geographical area, and add information from new survey respondents and interviews. No information provided by the interviewee and survey respondents was removed from the DEIS CIA.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>one has three other interviews, so four interviews. Four interviews of people regarding what's happening out there. And we offered to be interviewed, but there was no -- no response, no reply. And then it reads here, part of my initial email says, it's not our intention to be critical or point of the various deficiencies of the culture impact assessment prepared by Honua Consulting for the DEIS. However, such reports should be expected to be conducted at a high standard of accuracy and completeness, because they often reference -- become a record of cultural resources and native Hawaiian practices and traditions that will be referenced and often regurgitated in future reports. The archeological reports are inadequate. There is no comprehensive archaeological report done for PTA. There is no comprehensive TCP, traditional cultural properties report done for PTA. I've been mentioning that time and time over and over and many other projects. It lacks a comprehensive archeological report and so we come back to the -- to the - - the region of influence. You guys are trying to narrow the region of influence, but you're not supposed to that when it comes to historic and culture resources according to these historic preservation laws. You're supposed to look at the whole scope, but you guys haven't even done anything to that effect. I also requested access to the archeological reports. You referenced all these reports. What's in the -- the -- the draft EIS, is a -- is a literate review of archeological sites. So you have all these reports, but the public does not have assess to these reports to even determine their accuracy or not. I'm requesting, once again, access online or some other means that we, as a public. And we as Kānaka Maoli's, Native Hawaiians, when you're talking about our cultural sites and our culture traditions, we want to see what's been written and I just -- not just a bibliography as such. Okay. I'm going to resubmit my comments again. Basically, I'm just going to change the date, put a -- a new date, 2024, resubmit it, and I don't expect anything to change. That's basically it. It comes back to my -- my comment the last time. Nothing ever comes of it, so why even come.</p>	

Responses to Second Draft EIS Comments

Commenter	Submitted By	Comment	Response
		<p>Okay. With all that said, let me give you the -- what's the significance of Pohakuloa from our cultural perspective. Pohakuloa in the center of the island. Pu'u Ko'o, Pu'u Kole is the center piko of this island of Moku o Keawe, the island of Hawaii. It's the energetic piko of the island. If you go there, you'll know why. It is ahu there. As through 'ike kūpuna ancestral insight that was shared with us when we went there and civil ceremony and other times, it holds the center of the island. The piko there, their energy lines run from east to west. It goes from Hā'ena to Ahu'ena. Those are north to south. Near Kapulani down to near between -- near to Honu'apo . It crisscrosses at that place. None of the energy lines crisscross at that center of Pu'u Kole but -- and from the top energy lines from the rounds of above Wākea to the Piko o luna to the Piko o waena, the Piko o lalo to Papahānaumoku the energy lines go from above there. They're also multidimensional. It holds the energy, not just of this island, but in the middle of the Pacific. So every time you're bombing up there or doing war activities up there, you're disturbing these energy lines that hold, not just this island, but hold this earth intact in some capacity. And so what's going on up there? There's two things going on up there. One is the physical destruction of our 'āina, with everything that's going up there. And another part is the -- the disturbance, the -- you're causing disturbance on the -- the -- you're -- you're bringing in a imprint of fighting, war, hate, anger, killing on the land. You're -- you're putting in an energetic imprint on the land. Those are two things that's been impacted up there. Physical impact, energetic impact, and you're impacting us as a peoples on this lands, and you're also impacting everything else connected to them. So E ka piko o ka pu – pole – pu'u kole a, e ka piko me ke aloha me ka mana, i ka lākahi e pili no tātou a pau loa, mahalo nui no teia hui ana, mahalo nui no teia hui ana, mahalo no tatou.</p>	
E. Kalani Flores		<p>Actually, you know, there was a mention about Kaho'olawe and many of us grew up in the movement of Protect Kaho'olawe. And I remember going to the hearings and the testimonies and the admiral of the Navy would</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>say, Kaho’olawe is important for the national defense. I hear you guys say the same thing about Pohakuloa. It's not really that necessary because you left Pohakuloa -- I mean you left Kaho’olawe. This Navy is still functioning. The military is still functioning. You guys leave Pohakuloa, you're going to still be functioning. You're going to figure out other ways to do things. It's not necessary. It's not necessary to be up there -- to be destroying the land and the ‘āina. It's not necessary to be there. Even though you guys say you need it, you don't really need it. You don't have to be there. I just wanted to say that because we heard the same spiel from the -- before in other hearings when we -- when we in the Protect Kaho’olawe movement. And so with that said, I would just to end -- quote George Helm, in which he says, “Man is merely the caretaker of the land that maintains his life and nourishes his soul, therefore, the ‘āina is sacred”. Mahalo.</p>	
E. Kalani Flores	Flores-Case ‘Ohana	<p>This second DEIS still fails to accurately describe the affected environment by limiting the Region of Influence (ROI) and the scope of discussion regarding certain resources to only the parcels of state-leased lands by excluding the other adjacent and relevant lands of the Pōhakuloa Training Area (PTA). Yet, areas within the state-leased lands are being utilized as firing points for live-fire training exercises which extend beyond the state-leased lands. Thus, the environmental consequences lack a thorough discussion of the environmental effects and their significance.</p>	<p>The Proposed Action is a real estate action (i.e., administrative action) that would enable the continuation of ongoing activities on the State-owned land. Appendix E lists other available Environmental Assessments and Environmental Impact Statements by the Army and other agencies for PTA. Each resource area in Chapter 3 provides a subsection on the identified Region of Influence for the resource analysis, including the rationale for how the Region of Influence was established.</p>
E. Kalani Flores	Flores-Case ‘Ohana	<p>The U.S. Army is also not in compliance with the National Historic Preservation Act (NHPA). A comprehensive archaeological inventory survey for PTA including the state-leased lands has failed to be conducted. This has resulted in a number of eligible historic properties not being nominated to the National Register of Historic Places (NRHP). Also, the U.S. Army has failed to complete an accurate assessment of Traditional Cultural Properties (TCPs) and properties of traditional religious and cultural importance (PTRCIs) to Native Hawaiians within PTA. In addition, a required Section 106 consultation process has not been done for the DEIS.</p>	<p>Section 3.4.2.1 clarifies that this EIS complies with the requirements of NEPA and HEPA. Since the Proposed Action is an administrative action, which is not the type of undertaking that has the potential to cause an effect on historic properties, Section 106 consultation regarding the proposed action is not required. Section 5.3.1 notes that ongoing activities facilitated by the Proposed Action have established mitigation measures through the 2018 Programmatic Agreement executed with SHPD and the Advisory Council on Historic Preservation. Section 5.3.2 discusses that compliance with Chapter 6E would occur after the EIS process.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
			Section 3.4.2 explains that separate Section 106 consultation is also conducted for other activities that fall outside the parameters of the 2018 Section 106 PA for PTA.
E. Kalani Flores	Flores-Case 'Ohana	In addition, statements claiming that if the No Alternative Action is selected that “adverse environmental impacts would occur for biological and cultural resources” is also absolutely false. The primary adverse impacts and threats to these resources have been military training activities, live-fire exercises, and large-scale wildfires originating from military activities in PTA.	Please see General Response 1.
E. Kalani Flores	Flores-Case 'Ohana	Furthermore, the Cultural Impact Assessment (CIA) is in a worse substandard and unacceptable condition than the first DEIS with the drastic reduction from 388 pages to just 98 pages (excluding appendices). Also, comments provided to enhance the CIA were typically ignored. In addition, when we attempted to participate in the CIA process, we were excluded as requests (emails dated June 2 and December 31, 2022) to be interviewed were never responded to as noted in Attachment 1.	The first draft CIA was revised to improve readability, focus analysis within the project area and broad geographical area, and add information from new survey respondents and interviews. No information provided by the interviewee and survey respondents was removed from the DEIS CIA.
E. Kalani Flores	Flores-Case 'Ohana	The report inaccurately made determinations that potential TCPs did not meet the National Register criteria based upon the following non-existent criteria that was inserted into the report, “It must be important to the community today and play the same role in the community’s traditions as it did in the past.” (see p. 7) However, the NPS National Register Bulletin 38 in “Determining Eligibility Step-by-Step” does not include the aforementioned criteria in the four outlined steps. Likewise, this stated criteria is not found anywhere in Bulletin 38. Yet, it was erroneously used in this report for evaluating potential TCPs within PTA. * Instead, Bulletin 38 provides the following definition, “A traditional cultural property, then, can be defined generally as one that is eligible for inclusion in the National Register because of its association with cultural practices or beliefs of a living community that (a) are rooted in that community’s history, and (b) are important in maintaining the continuing cultural identity of the community.” As such,	Section 3.4.2.1 clarifies that this EIS complies with the requirements of NEPA and HEPA. Since the Proposed Action is an administrative action, which is not the type of undertaking that has the potential to cause an effect on historic properties, Section 106 consultation regarding the proposed action is not required. Section 5.3.1 notes that ongoing activities facilitated by the Proposed Action have established mitigation measures through the 2018 Programmatic Agreement executed with SHPD and the Advisory Council on Historic Preservation. Section 5.3.2 discusses that compliance with Chapter 6E would occur after the EIS process.  Section 3.4.2 explains that separate Section 106 consultation is also conducted for other activities that fall outside the parameters of the 2018 Section 106 PA for PTA.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>TCPs within PTA are defined as part of the Native Hawaiian community and are eligible for nomination to the National Register. * This report limited its assessment of potential TCPs and PTRCIs and their NRHP eligibility to a few select cultural practices and properties. (p. 8) * This report omitted assessment of potential TCPs and PTRCIs previously identified in documents prepared for the U.S. Army, i.e. FEIS Military Training Activities at Mākua Military Reservation, Hawai‘i (June 2009) and Striker Brigade Combat Team FEIS (May 2004. (see References Cited, pp. 65-78)</p>	
E. Kalani Flores	Flores-Case ‘Ohana	<p>This report omitted any assessment on the significance of the cultural landscape and associated place names as it pertains to TCPs and PTRCIs within PTA. Site visits within PTA to identify potential TCPs and PTRCIs with Native Hawaiian informants did not occur as part of the assessment process for this report.</p>	<p>Section 4.3 of the CIA provides an overview of previous ethnographic studies that were conducted at PTA, including McCoy and Orr (2012). While This study was commissioned by the Army to identify any properties at PTA that may be eligible for the National Register. EIS Section 3.4.2.1 of the EIS clarifies that this EIS complies with the requirements of NEPA and HEPA. Since the proposed action is an administrative action it does not require compliance with requirements under NHPA or HRS Chapter 6E. Since the Proposed Action is an administrative action, which is not the type of undertaking that has the potential to cause an effect on historic properties, Section 106 consultation regarding the proposed action is not required. Section 5.3.1 notes that ongoing activities facilitated by the Proposed Action have established mitigation measures through the 2018 Programmatic Agreement executed with SHPD and the Advisory Council on Historic Preservation. Section 5.3.2 discusses that compliance with Chapter 6E would occur after the EIS process. EIS Section 3.4.2 explains that separate Section 106 consultation is also conducted for other activities that fall outside the parameters of the 2018 Section 106 PA for PTA.</p>
E. Kalani Flores	Flores-Case ‘Ohana	<p>In addition, there are deep concerns about the health issues for this land and our people as the result of PTA being contaminated with military munitions that may potentially have soil, groundwater and surface water contamination from munitions residues (including explosives and heavy metals, chemical warfare agents or</p>	<p>The best available scientific data for groundwater and surface water quality was incorporated into this EIS. Section 3.9.4.6 of the EIS documents the existing management measures utilized by the Army to protect water resources. The State Department of Health (DOH) Safe Drinking Water Branch (SDWB) monitors</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>depleted uranium). These residues may derive from partially detonated and decomposing ordnance and explosives from training activities, flares, smoke grenades, open burning and open detonation disposal activities, munitions burial sites, weapons testing or other military activities. Although initially denied by the U.S. Army, it has since been documented that the military used munitions with depleted uranium (DU) during the 1960's within PTA. Likewise, there are concerns about the disbursement of lead from the ammunition of small arms firing from past and ongoing training activities. Also, it's highly likely that spills or dumping of toxins have occurred at PTA. All of these environmental impacts have occurred right over a major water aquifer on Hawai'i Island.</p>	<p>groundwater quality of aquifers as described in EIS Section 3.9. SDWB has released groundwater contamination maps for Hawai'i Island that show most contamination is along the eastern coast of the island. You can learn more directly from the source cited in this section, the DOH SDWB Environmental Health Portal at <a href="https://eha-cloud.doh.hawaii.gov/sdwb/#!/home">https://eha-cloud.doh.hawaii.gov/sdwb/#!/home</a>.</p> <p>Section 3.5 Hazardous Substances and Hazardous Wastes presents the existing conditions from current activities at PTA and notes that risk of contaminants mobilizing is not a concern as limited surface water and groundwater pathways on the State-owned land pose minor potential impact to soil and groundwater quality.</p> <p>See Sections 3.5.4.12 and 3.6.4 for discussion on depleted uranium and the Army's 2009 air quality monitoring program, which concluded that depleted uranium had not impacted air quality at PTA or in the surrounding area.</p>
E. Kalani Flores	Flores-Case 'Ohana	<p>At the minimum, an archaeological inventory survey should be done for all State-leased lands that are being considered as alternatives in this DEIS. However, this has not been done. Also, the U.S. Army should make the surveys and reports listed in the archaeological literature review of this DEIS accessible to members of the public to review by posting digital copies online. Without such access to these documents, the public doesn't have the ability to make adequate and thorough comments pertaining to the potential impacts upon the cultural resources within PTA. In addition, without access to these documents, information presented in this DEIS can't be verified for accurateness and completeness. This DEIS lacks a comprehensive archaeological analysis as it only included a limited literature review of previous archaeological reports.</p>	<p>Section 3.4.4.6 discusses the Army's CRM Program at PTA, including the State-owned land. Previous archaeological surveys are provided in Table 3-14 of the EIS. Section 3.4.4.3 discusses why portions of State-owned land have not been surveyed.</p>
E. Kalani Flores	Flores-Case 'Ohana	<p>The nature of this DEIS that would trigger a Section 106 undertaking would also warrant a more comprehensive cultural resources study and archaeological investigations for the State-leased land. Likewise, the U.S. Army has</p>	<p>Since the Proposed Action is an administrative action, which is not the type of undertaking that has the potential to cause an effect on historic properties, Section 106 consultation regarding the proposed action is</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>failed to conduct aerial inventory surveys using drones or other aircraft for remote or inaccessible areas, including unsurveyed areas, despite having the technology and means to do so.</p>	<p>not required. Section 5.3.1 notes that ongoing activities facilitated by the Proposed Action have established mitigation measures through the 2018 Programmatic Agreement executed with SHPD and the Advisory Council on Historic Preservation. Section 5.3.2 discusses that compliance with Chapter 6E would occur after the EIS process.</p>
E. Kalani Flores	Flores-Case 'Ohana	<p>In addition, the U.S. Army has not completed an accurate and thorough assessment of Traditional Cultural Properties (TCPs) and properties of traditional religious and cultural importance (PTRCIs) to Native Hawaiians within PTA, including the State-leased land. Some of the previous archaeological studies have identified Areas of Traditional Importance (ATI) that might be potential TCPs and/or eligible as formal PTRCIs within PTA. Likewise, landscapes that are connected to the Native Hawaiian culture are considered ATI. However, cultural landscapes have not been formally evaluated at PTA. (FEIS MMR 2009, p. 3-303) In addition, consultation with Native Hawaiian organizations, and other interested groups and individuals to assess the cultural significance of these properties and their NRHP eligibility has not occurred. The DEIS and associated reports, including the ALR, failed to include any narratives and information on these matters. Although the CIA does list some wahi pana as PTRCI, the list is incomplete.</p>	<p>Since the Proposed Action is an administrative action, which is not the type of undertaking that has the potential to cause an effect on historic properties, Section 106 consultation regarding the proposed action is not required. Section 5.3.1 notes that ongoing activities facilitated by the Proposed Action have established mitigation measures through the 2018 Programmatic Agreement executed with SHPD and the Advisory Council on Historic Preservation. Section 5.3.2 discusses that compliance with Chapter 6E would occur after the EIS process.</p>
E. Kalani Flores	Flores-Case 'Ohana	<p>The DEIS (pp. 3-49 and 3-50, Table 3-7) and Cultural Impact Assessment (CIA) prepared by Honua Consulting cites the ethnographic study by Patrick McCoy and Maria Orr, Final Report: Ethnographic Study of Pōhakuloa Training Area and Central Hāmākua District, Island of Hawai'i, State of Hawai'i, (November 2012). However, this report is considered very incomplete and inaccurate as it pertains to traditional cultural properties (TCPs) within PTA. This study was extremely limited in its ethnographic scope, oral histories, and archival research that was utilized in the analysis of TCPs. In addition, this study failed to properly consider significant cultural landscape features such as pu'u as being TCPs. Despite several other EISs and surveys having identified potential TCPs within PTA, the</p>	<p>Since the Proposed Action is an administrative action, which is not the type of undertaking that has the potential to cause an effect on historic properties, Section 106 consultation regarding the proposed action is not required. Section 5.3.1 notes that ongoing activities facilitated by the Proposed Action have established mitigation measures through the 2018 Programmatic Agreement executed with SHPD and the Advisory Council on Historic Preservation. Section 5.3.2 discusses that compliance with Chapter 6E would occur after the EIS process.</p> <p>EIS Section 3.4.2 explains that separate Section 106 consultation is also conducted for other activities that fall</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>archaeological firm and authors of this report, with limited or no previous survey experience within PTA, have systematically dismissed previously identified TCPs. Although the authors of the report have apparently at least looked at National Register Bulletin 38, there is little evidence that they've made any reasonable effort to identify potential TCPs by following the guidelines and methods set forth in this bulletin. Instead, it appears that they have cherry-picked concepts, and in some cases made them up, to support their conclusions that TCPs are non-existent within PTA. Thus, providing an ostensibly authoritative basis for writing-off TCPs within PTA and perhaps more importantly, allowing military activities and undertakings to move forward within an environmentally and culturally sensitive landscape. In addition, as noted in Section 2.1 of this report, it lacked any direct consultation with Native Hawaiian organizations (NHOs), Office of Hawaiian Affairs (OHA), or cultural practitioners in the identification of TCPs. Likewise, field inspections with NHOs, OHA, or cultural practitioners were not done.</p>	<p>outside the parameters of the 2018 Section 106 PA for PTA.</p>
E. Kalani Flores	Flores-Case 'Ohana	<p>Conclusively, this Ethnographic Study of PTA is deficient in its identification of TCPs within PTA and should not be cited or referenced in this DEIS or CIA to substantiate any conclusions pertaining to TCPs. This report further affirms that the lack of sufficient archaeological survey work, information, and mapping has prevented the U.S. Army from completing the NRHP nomination process for known historic properties within PTA. It's not our intention to be critical or point out the various deficiencies of the Cultural Impact Assessment (CIA) prepared by Honua Consulting for this DEIS. However, such reports should be expected to be conducted at a high standard of accuracy and completeness because they often become a record of cultural resources and Native Hawaiian practices and traditions that will be referenced and often regurgitated in future reports. This expectation is also stated on Honua Consulting's website as such, "We hold ourselves to the highest standards of excellence." Although the CIA considered "the geographic extent for traditional and customary practices as the region between Mauna Kea,</p>	<p>Since the Proposed Action is an administrative action, which is not the type of undertaking that has the potential to cause an effect on historic properties, Section 106 consultation regarding the proposed action is not required. Section 5.3.1 notes that ongoing activities facilitated by the Proposed Action have established mitigation measures through the 2018 Programmatic Agreement executed with SHPD and the Advisory Council on Historic Preservation. Section 5.3.2 discusses that compliance with Chapter 6E would occur after the EIS process. EIS Section 3.4.2 explains that separate Section 106 consultation is also conducted for other activities that fall outside the parameters of the 2018 Section 106 PA for PTA. Section 1.3 of the CIA notes how the broad geographical area (a 3-mile buffer around the State-owned land and U.S. Government owned land at PTA) was informed by OEQC guidelines.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>Mauna Loa, and Hualālai, known generally as the Saddle Region,” most of the information in this report lacked any substantial new information. A large portion of this report was copied from other previous Mauna Kea reports. It’s very apparent that the same type of extensive and comprehensive archival research that was compiled and published by Kepā and Onaona Maly for Mauna Kea was not applied to other areas of PTA. Very little new information and archival research was included about the Mauna Loa region even though the boundaries of PTA extend up its slopes and the ahupua’a of Ka’ohe extends up to its summit and Moku’āweoweo caldera. Similarly, there is a lack of cultural information about the region of Hualālai. The CIA only included one interview as part of this report and thus lacked adequate information as well as engagement with NHOs and cultural practitioners.</p>	
E. Kalani Flores	Flores-Case ‘Ohana	<p>The information in Tables 4, 5, 6, and 15 of the CIA has been presented in an unorganized and inaccurate manner. Firstly, the listing of place names should be listed in alphabetical order so that they can be more easily searchable. The listing appears to be unorganized and done randomly. Also, it’s suggested that the place names in Tables 4-6 be combined into one table/list and include another column that identifies the map(s) or sources. Place names/wahi pana from other earlier maps and other sources should also be included in the combined table/list. This would make it much easier for someone from the public to review and analyze the research. It is very apparent that Tables 4-6 are missing several noted wahi pana such as Kūkahau’ula (summit), Waiau (lake), Lilinoe (spring), etc. Also, Table 15 is missing the unnamed pu’u within PTA. Secondly, some of the data in the “Translation” column are actually descriptions of these place names and not literal translations. Likewise, some of these descriptions are for place names on other islands or in other districts and they are not even relevant to the wahi pana of this area. The source of descriptions and translations in the tables are not identified, although they appear to be extracted from Place Names of Hawai’i. It is suggested that translations of these place names also be</p>	<p>The CIA, to include tables and figures, was revised for the Second Draft EIS.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>extracted from the various Hawaiian dictionaries as well as from other sources if available. Some of the translations appear misconstrued and their source unidentified. For example in Table 15, it has the literal translation for Pu‘u Koko as “clot of blood or heart” as compared to “blood (koko)* hill.” Likewise, the term koko could also be kokō or kōkō. Based upon a cultural context, the definition is definitely not “clot of blood or heart” as listed. Another example in Table 5, it has the literal translation for Ahu A ‘Umi as “strangled.” However, if thorough research had been done in other sources, more appropriate literal translations would have been obtained as such, “altar [used] by ‘Umi” (Place Names of Hawai‘i) or “Umi’s cairn” (Parker Dictionary). The CIA can be greatly improved with the presentation of the maps in the figures. The resolution of some maps are so low that it’s impossible to adequately review them (e.g. Figure 12).</p>	
E. Kalani Flores	Flores-Case ‘Ohana	<p>Despite the acknowledgement of the significance of pu‘u, the CIA failed to identify a number of pu‘u within PTA. Only the pu‘u identified on maps are referenced in this report. As a result, there were a number of pu‘u without traditional Hawaiian names within PTA that weren’t identified in the CIA. Also, the superimposing of pu‘u and other place names on some of the historic maps when they aren’t actually found on these maps distorts the historic record. (See Figure 3) Likewise, when some of these names were superimposed on these historic maps, they were positioned in the wrong locations. Based upon personal experience from site visits with PTA staff, E. Kalani Flores has noticed that some of these unidentified pu‘u were used as landmarks that were in alignment with certain trails and habitation sites. In addition, the CIA failed to identify other significant geographical features such as lava tubes, caves, and gulches, and some lava flows. The significance of these features are that they are referenced in early accounts, surveys, and travels through this area. Also, only two photos (cover photo and Figure 29) of the landscape are included in the CIA. Thus, the CIA lacks sufficient photos and information depicting the cultural landscape and significant features that are directly</p>	<p>This comment was submitted during the first Draft EIS public comment period, provided a response, and resubmitted during the second Draft EIS public comment period. The OEQC guidelines note that historic maps should be included in a CIA. The maps have been revised to distinguish PTA boundaries and the broad geographical area established for the analysis. Pu‘u names were sourced from the historic maps and informant interviews.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>connected to Native Hawaiian cultural traditions and practices. Shown below is an example of the types of photos (depicting a cultural landscape in Kohala) with the pu'u names superimposed that should be included in the CIA. The CIA lacks an adequate discussion of wai (fresh water) elements and the connection to Native Hawaiian cultural practices, traditions, akua and kupua. Traditional mo'olelo and oli clearly identify Kāne, Waiau, Poliahu, Lilinoe, Līhau, Kahoupouokāne, and others associated with their kinolau and fresh water forms on Mauna a Wākea. Therefore, it's not surprising that the sacred springs on this mountain were called Lilinoe, Waihuakāne (Waihu), and Kahoupookāne (spelling variations: Houpokane, Hopukani, Hapukani, etc.). Consequently, the use and diversion of water from these sacred springs by PTA and the State are considered forms of desecration in a cultural context especially when it's being used to flush toilets and other non-potable uses. There are cultural practitioners today that still collect this wai kapu from the source points where they first emerge from the ground for use in ceremonies.</p>	
E. Kalani Flores	Flores-Case 'Ohana	<p>Inaccurate accounts are interspersed throughout the ALR and CIA. These errors apply to basic knowledge and researching skills. They are too numerous to list. This is troubling because it brings into question the accurateness and completeness of other areas in these reports. A few examples of these inaccurate and misconstrued accounts are noted below.</p>	<p>This comment was submitted during the first Draft EIS public comment period, provided a response, and resubmitted during the second Draft EIS public comment period.</p>
E. Kalani Flores	Flores-Case 'Ohana	<p>LACKS COMPREHENSIVE REVIEW OF CUMULATIVE IMPACTS The DEIS is inadequate in that it lacks a comprehensive review of cumulative impacts by narrowing the Region of Influence (ROI) as it pertains to the respective cultural and biological resources. It's very evident that several of the previous projects within PTA were planned and reviewed as individual actions and not as part of a comprehensive review of the proposed undertakings at PTA that should be appropriately addressed in an EIS. Likewise, the ROI or Area of Potential Effect (APE) for each of these projects' proposed actions were greatly reduced in order to orchestrate "findings of</p>	<p>The region of influence for historic and cultural resources and cultural practices cumulative impacts is the same as that for the Proposed Action (see Section 3.4.3), which extends beyond the State-owned land for cultural practices.</p> <p>The region of influence for biological resources cumulative impacts is the same as that for the Proposed Action (see Section 3.3.3), which is correctly based on ecological boundaries rather than land type uses (e.g., military installations) or administrative boundaries (e.g., State of Hawaii).</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>no significant impact” for the U.S. military undertakings at PTA. As a result, there has been a failure to disclose the cumulative impacts upon the biological, cultural, and historic resources at PTA. This DEIS has taken the same approach. The ROI for the cultural resources assessment was limited to just the State-leased lands instead of the entire PTA as noted below:</p>	<p>Table 4-1 presents past, present, and reasonably foreseeable future actions, including those throughout PTA and beyond PTA, that have the potential to contribute to cumulative impacts. These actions are analyzed as part of cumulative impacts in Sections 4.4 and 4.5.</p> <p>The region of influence and finding of no significant impact for previous NEPA documents at PTA are not relevant to the EIS.</p>
E. Kalani Flores	Flores-Case ‘Ohana	<p>The ROI for the biological resources was also limited to just the State-leased and adjacent lands instead of the entire PTA area as noted below...Even with this ROI being restricted to just the afore-mentioned areas, Figures 3-4 and 3-5 failed to accurately show “where population distributions of plants or animals are contiguous” to State-leased land. Also, these maps fail to accurately show the “wildlife corridors and areas encompassing habitats that connect” to the State-leased land. Even with this ROI being restricted to just the afore-mentioned areas, Figures 3-4 and 3-5 failed to accurately show “where population distributions of plants or animals are contiguous” to State-leased land. Also, these maps fail to accurately show the “wildlife corridors and areas encompassing habitats that connect” to the State-leased land.</p>	<p>No wildlife corridors have been documented on PTA and thus could not be included on a figure.</p>
E. Kalani Flores	Flores-Case ‘Ohana	<p>Furthermore, the following statement pertaining to cumulative impacts upon the historic and cultural resources (see section 4.4.3) are utterly false as these cumulative impacts have been adverse and would continue as such with the present and foreseeable future actions involving live-fire exercises and other military training activities involving the action alternatives with the exception of the the No Alternative Action.</p>	<p>Section 4.4, Historic and Cultural Resources and Cultural Practices, notes that cumulative impacts on historic and cultural resources would be less than significant (given existing management measures and proposed mitigation measures) but would be significant on cultural practices. Section 4.4, Historic and Cultural Resources and Cultural Practices, revised for clarification.</p>
E. Kalani Flores	Flores-Case ‘Ohana	<p>Native Hawaiian traditional and customary practices are directly tied to the biological resources. With the failure to complete a comprehensive review of the cumulative impacts pertaining to these biological resources, an analysis of the potential impacts upon Native Hawaiian practices can not be adequately assessed. Conclusively,</p>	<p>Section 4.4, Historic and Cultural Resources and Cultural Practices, revised to discuss the connection between biological resources and cultural practices as well as the associated cumulative impacts on cultural practices.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		this DEIS doesn't include a comprehensive review of the cumulative impacts upon the cultural and biological resources within PTA.	
E. Kalani Flores	Flores-Case 'Ohana	INADEQUATE CONSULTATION This DEIS is an incomplete document because it is blatantly void of any Section 106 consultation with Native Hawaiian organizations (NHOs) and/or individuals as required by federal law. The U.S. Army is required by regulations at 36 CFR Part 800 to implement Section 106 of the NHPA (54 U.S.C. Part 306108) to consult with NHOs and Native Hawaiian individuals who have an interest and/or connection to this area due to the proposed undertaking. According to Section 101(d)(6)(B) of this act, it requires "the agency official to consult with any Indian tribe or Native Hawaiian organization that attaches religious and cultural significance to historic properties that may be affected by an undertaking."	<p>Section 3.4.2.1, ("Evaluation of Traditional and Cultural Properties Under NHPA") clarifies that this EIS complies with the requirements of NEPA and HEPA and does not address compliance requirements under NHPA or HRS Chapter 6E. Separate Section 106 consultation is also conducted for other activities that fall outside the parameters of the 2018 Section 106 Programmatic Agreement for PTA.</p> <p>Section 5.3.1 notes that the Proposed Action would be consistent with the NHPA because ongoing activities facilitated by the Proposed Action have established mitigation measures through the 2018 Programmatic Agreement executed with SHPD and the Advisory Council on Historic Preservation. The Programmatic Agreement is a 15-year agreement that will remain in effect until at least 2033.</p>
E. Kalani Flores	Flores-Case 'Ohana	The assertion that USARHAW and 3rd Marine Regiment would have to restation if the No Alternative Action is selected is blatantly false. The DEIS failed to accurately disclose other alternative training areas presently being used on O'ahu and elsewhere. In addition, the DEIS failed to disclose the cost savings of not transporting equipment and the deployment of troops from O'ahu to PTA for training. Previously, the U.S. Navy stated that the use of Kaho'olawe as a bombing target and military training was vital to the interest of national defense and troop readiness and that there weren't any alternatives. As history has demonstrated, that wasn't true when the bombing and live-fire training exercises ended in 1990. The Navy didn't leave Hawai'i.	<p>Section 1.2 provides information on the strategic importance of Hawai'i for national defense and PTA's role. Section 1.3 describes the purpose and need of the Proposed Action.</p> <p>Section 2.2.4 identifies the training and support facilities and features within the State-owned land that cannot be replicated within U.S. Government-owned portions of PTA and are not available elsewhere in Hawai'i. Consequently, there would be no cost savings from not transporting equipment and troops from O'ahu to PTA because training within the State-owned land could not be fully accommodated within O'ahu training areas.</p>
E. Kalani Flores	Flores-Case 'Ohana	The DEIS Section 3.3 Biological Resources is incomplete as it fails to include a listing of all known Hawaiian plants in addition to those listed in Table 3-3.	Section 3.3.4.3 contains information on native and protected plants with the note that the complete list of native plants documented on PTA is available in the Integrated Natural Resources Management Plan. A link to the Integrated Natural Resources Management Plan has been added to Chapter 6 of the EIS as well as the PTA EIS

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
E. Kalani Flores	Flores-Case 'Ohana	The DEIS Section 3.4 Cultural Resources is incomplete for failure to complete an accurate and thorough assessment of Traditional Cultural Properties (TCPs) and properties of traditional religious and cultural importance (PTRCIs) to Native Hawaiians within PTA, including the State-leased land. Also, it lacks a comprehensive archaeological analysis of cultural resources. In addition, Table 3-7 is an extremely incomplete and inaccurate report as it pertains to TCPs within PTA.	<p>website (<a href="https://home.army.mil/hawaii/ptaeis/project-home">https://home.army.mil/hawaii/ptaeis/project-home</a>) under the "Documents" tab.</p> <p>Since the Proposed Action is an administrative action, which is not the type of undertaking that has the potential to cause an effect on historic properties, Section 106 consultation regarding the proposed action is not required. Section 5.3.1 notes that ongoing activities facilitated by the Proposed Action have established mitigation measures through the 2018 Programmatic Agreement executed with SHPD and the Advisory Council on Historic Preservation. Section 5.3.2 discusses that compliance with Chapter 6E would occur after the EIS process.</p>
E. Kalani Flores	Flores-Case 'Ohana	<p>LACKS MITIGATION MEASURES FOR HAZARDOUS &amp; TOXIC MATERIALS &amp; WASTE The DEIS is inadequate in that it lacks any mitigation measures for all alternatives pertaining to the hazardous and toxic materials and waste located on the State-leased lands as well as in the entire PTA that have been generated by military activities. In addition, it's contended that the Level of Significance being listed as "Less than significant" for Alternatives 1-3 is totally inaccurate. The DEIS doesn't include any cost estimates or analysis for the clean-up and removal of hazardous and toxic materials and waste, including unexploded ordnance and munitions debris/residues, from State-leased lands as it pertains to the various alternatives. The land contaminated with military munitions may potentially have soil, groundwater and surface water contamination from munitions residues (including explosives and heavy metals, chemical warfare agents or depleted uranium). These residues may derive from partially detonated and decomposing ordnance and explosives from training activities, flares, smoke grenades, open burning and open detonation disposal activities, munitions burial sites, weapons testing or other military activities. Also, the entire 2017 ECOP report should be included in the DEIS appendix or an online link to this report should be made accessible to the public in order to verify the analysis of this criteria.</p>	<p>As stated in Section 3.5.6, the analysis contained within the EIS has concluded that no mitigation measures are recommended beyond the existing management measures described in Section 3.5.4.14.</p> <p>Section 3.5.2 revised to add the definition of operational ranges.</p> <p>Section 2.1 states that after expiration of the current lease, the Army would follow federal law and regulations to determine how and when cleanup and restoration activities for hazardous substances and MEC within the State-owned land not retained would occur under the CERCLA process.</p> <p>Section 3.5.6 revised to clarify that following completion of lease compliance actions and cleanup and restoration activities, the Army would remain responsible for disposing of any MEC that is incidentally found on the State-owned land not retained due to the DoD's live-fire military training at PTA.</p> <p>Sections 3.5.4.11 and 3.5.4.12 describe the lack of mobilization of munitions constituents within soil, groundwater, and surface water. The text notes that risk of contaminants mobilizing is not a concern as limited surface water and groundwater pathways on the State-</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
			<p>owned land pose minor potential impact to soil and groundwater quality.</p> <p>The economic costs to the Army under the various alternatives are beyond the scope of the EIS. The EIS analyzes the potential effects on the environment.</p> <p>Links to the Phase I and II ECOP reports have been added to the PTA EIS website (<a href="https://home.army.mil/hawaii/ptaeis/project-home">https://home.army.mil/hawaii/ptaeis/project-home</a>) under the “Documents” tab.</p>
E. Kalani Flores	Flores-Case ‘Ohana	<p>The DEIS Section 3.7 Noise is inaccurate and incomplete because it is apparent that the noise analysis of troop training is based primarily on modeling instead of actual monitoring. Case in point, we have experienced hearing live-firing outside of the PTA boundaries in cultural and recreational areas such as the Gilbert Kahele (Mauna Kea) Recreational Area, summits of Mauna Kea and Mauna Loa, and surrounding areas both during daylight and evening hours. In addition, artillery live-firing can be heard and felt in residential areas from adjacent Waiki‘i and Humu‘ula – Department of Hawaiian Home Lands and as far away as Waimea and other residential areas. The noise impact upon Kanaka Maoli cultural practitioners during ceremonies and activities occurring within and outside of PTA is not addressed. Alternatives 1-3 should be considered a “Significant impact” especially with the concentration of training areas, firing-points, and the airfield within or adjacent to the State-leased land. Conclusively, the narratives, summary of impacts, level of significance, and Figures 3-8 to 3-10 do not accurately reflect these noise impacts.</p>	<p>The best available data for noise analysis was incorporated into this EIS. A noise modeling study was done in 2020 that considered noise zones for military munitions using a baseline model (EIS Figure 3-11), a neutral weather model (EIS Figure 3-12), and a model for weather conditions that enhance sound propagation (EIS Figure 3-13). The study showed that generally not compatible (Zone II) noise levels extend slightly beyond the PTA boundary encompassing forest reserve land.</p> <p>This study is discussed in Section 3.7.4 and analyzed in Section 3.7.6.</p> <p>Noise complaint information can be submitted to Pōhakuloa Public Affairs at <a href="mailto:usarmy.pta.id-pacific.mbx.pta-pao@army.mil">usarmy.pta.id-pacific.mbx.pta-pao@army.mil</a> or 808-787-7839. Please note that concerns are responded to during regular business hours, Monday through Friday, 8:00 a.m. – 4:00 p.m., excluding holidays.</p>
E. Kalani Flores	Flores-Case ‘Ohana	<p>The DEIS Section 3.8 Geology, Topography and Soils is incomplete for not including a geological survey of the unique lava flows, substrate, configurations, and lava tubes within PTA and the State-leased lands.. Also, the extent of permanent and irreversible impact upon this landscape as the result of site clearing, grading, ground softening, roads/trails, and quarrying has not been disclosed.</p>	<p>This comment was submitted during the first Draft EIS public comment period, provided a response, and resubmitted during the second Draft EIS public comment period. Section 3.8.4.2 discusses lava flows and quarries within the State-owned land; these features are shown in Figures 3-14 and 3-15. Section 3.8 of the EIS notes that the U.S. Fish and Wildlife Service recommends rock from onsite location be used to minimize inadvertent transport</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
			<p>of invasive plant species. Section 3.2 describes that the lease permits the Army to use rock and similar materials from the premises for construction on site. Impacts from maneuver training activities are monitored and managed through implementation of the ITAM program, which utilizes Best Management Plans to reduce erosion and runoff. These practices have been added to the EIS.</p>
E. Kalani Flores	Flores-Case 'Ohana	<p>In contradiction to what is stated in section 4.4.3. Cultural Resources, the U.S. Army failed in these past decades to mitigate the significant adverse impacts upon cultural resources through consultation with Native Hawaiians, and/or other ethnic groups as appropriate, to provide access to promote and protect cultural beliefs, practices, and resources. So why is it assumed that the Army will be able to accomplish any mitigations in the future. Thus, the statement in this section is clearly false.</p>	<p>Please see General Response 1.</p>
E. Kalani Flores	Flores-Case 'Ohana	<p>The DEIS Section 3.9 Water Resources is incomplete and inconclusive as there is insufficient studies and data to support any type of analysis of the impact and level of significance upon the groundwater. Likewise, the amount of hazardous and toxic materials and waste, including nonpoint source pollutants such as contamination from military munitions use during training activities, that has the potential to leach into the groundwater due to the fracturing of the earth surface due to the constant bombardment within the Impact Area is unknown. Any analysis must consider the Impact Area since the firing-points are located on the State-leased land. Also, the DEIS lacks an analysis of the impact and level of significance upon the use and diversion of water from the sacred springs of Kahoupookāne, Waihūakāne, and Lilinoe on Mauna a Wākea, also considered significant cultural resources.</p>	<p>This comment was submitted during the first Draft EIS public comment period, provided a response, and resubmitted during the second Draft EIS public comment period.</p> <p>The best available scientific data for groundwater and surface water quality was incorporated into this EIS. Groundwater and surface water quality are discussed in Section 3.9 of the EIS. Section 3.9.4.6 of the EIS documents the existing management measures utilized by the Army to protect water resources. The State Department of Health (DOH) Safe Drinking Water Branch (SDWB) monitors groundwater quality of aquifers as described in EIS Section 3.9. SDWB has released groundwater contamination maps for Hawai'i Island that show most contamination is along the eastern coast of the island. The DOH SDWB Environmental Health Portal can be accessed at <a href="https://eha-cloud.doh.hawaii.gov/sdwb/#!/home">https://eha-cloud.doh.hawaii.gov/sdwb/#!/home</a></p> <p>Section 3.9.4.3 of the EIS describes surface water use at PTA and its sources. Water use is authorized under a separate water lease from the State. Section 3.9.4.3 also notes that spring water from Pōhakuloa Gulch is diverted</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
			into a roughly 2.5-mile-long water line that routes the spring flow into six storage tanks that supply water to the Gilbert Kahele Recreation Area. PTA no longer uses or shares any of the spring water supplied to the Gilbert Kahele Recreation Area.
E. Kalani Flores	Flores-Case 'Ohana	In addition, this DEIS has failed to consider and/or disclose the adverse impacts of the proposed undertaking upon the ancestral akua and kupua connected to the area encompassed by PTA. Nowhere in these documents has it been cited that consultation has occurred directly with those ancestral akua and kupua connected to Mauna a Wākea, Mauna Loa, and those lands between them or indirectly through individuals with the ability to connect with them. Although this cultural perspective might seem difficult to grasp by those unfamiliar with these traditional practices, there are individuals who have the ability and gift to interact and communicate with such ancestral akua and kupua. We charge that this process of consultation with those recognized as the ancestral akua and kupua of these lands has not been done. It may also be difficult to perceive that these culturally significant mountains are still the home and domain of those whom our ancestors interacted with, those who regulated the weather, and those who safeguarded the heavens and the earth. Akua and kupua on these lands are manifested in the elements, such as the dew, the frost, the snow, the winds. In addition, there are those who dwell on the summits and saddle region who serve in the capacity as guardians for the sacred landscape. The proposed alternatives (especially when assessed from a cumulative perspective of this impact along with the past, present, and future activities associated with PTA and others) would create a significant disturbance to them and would also disrupt the energy and life forces that flow through and between these mountains. Consequently, the types of military activities create a physical and/or spiritual disturbance, disconnection, or imbalance between man and his akua, and between man and his environment.	Section 2.2 of the CIA details the three public outreach methods used to identify potential individuals who have expertise and knowledge of cultural resources, practices, and beliefs relevant to the project area and broad geographical area. This included 1) a publication in the Office of Hawaiian Affairs Ka Wai Ola for three months; 2) social media posts on Facebook and Instagram, leading to an online survey completed by 236 individuals; 3) direct outreach to specific organizations and individuals, as shown in Appendix A of the CIA.
E. Kalani Flores	Flores-Case 'Ohana	The DEIS Section 3.6 Air Quality and Greenhouse Gases is incomplete for failing to provide a detailed description of	There is only one type of fugitive dust. Section 3.6.4 revised to define fugitive dust as small particulate matter

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>the type of fugitive dust that has been generated by ongoing live-fire exercises, troop training, and wind erosion. There have been times when travel on Saddle Road has been curtailed during dust storms generated from the PTA area.</p>	<p>that is suspended in the air from soil that has been disturbed by wind or human activities. Text added to indicate that areas with less vegetative cover are more susceptible to fugitive dust production than highly vegetated areas and paved surfaces. The Army has no record of training related closures of Saddle Road due to fugitive dust.</p>
<p>E. Kalani Flores</p>	<p>Flores-Case 'Ohana</p>	<p>Likewise, this DEIS is not in compliance with particular HEPA and NEPA requirements noted in the sections underlined below. HRS §11-200.1-24 (i) The draft EIS shall include a description of the environmental setting, including a description of the environment in the vicinity of the action, as it exists before commencement of the action, from both a local and regional perspective. Special emphasis shall be placed on environmental resources that are rare or unique to the region and the action site (including natural or human-made resources of historic, cultural, archaeological, or aesthetic significance); specific reference to related actions, public and private, existent or planned in the region shall also be included for purposes of examining the possible overall cumulative impacts of such actions. Proposing agencies and applicants shall also identify, where appropriate, population and growth characteristics of the affected area, any population and growth assumptions used to justify the proposed action, and any secondary population and growth impacts resulting from the proposed action and its alternatives. The draft EIS shall expressly note the sources of data used to identify, qualify, or evaluate any and all environmental consequences. (1) The draft EIS shall include an analysis of the probable impact of the proposed action on the environment, and impacts of the natural or human environment on the action. This analysis shall include consideration of all phases of the action and consideration of all consequences on the environment, including direct and indirect effects. The interrelationships and cumulative environmental impacts of the proposed action and other related actions shall be discussed in the draft EIS. The draft EIS should recognize that several actions, in particular those that involve the construction of</p>	<p>Appendix A of the EIS contains a table of NEPA and HEPA rules and what section of the document those rules are addressed.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>public facilities or structures (e.g., highways, airports, sewer systems, water resource actions, etc.) may well stimulate or induce secondary effects. These secondary effects may be equally important as, or more important than, primary effects, and shall be thoroughly discussed to fully describe the probable impact of the proposed action on the environment. The population and growth impacts of an action shall be estimated if expected to be significant, and an evaluation shall be made of the effects of any possible change in population patterns or growth upon the resource base, including but not limited to land use, water, and public services, of the area in question. Also, if the proposed action constitutes a direct or indirect source of pollution as determined by any governmental agency, necessary data regarding these impacts shall be incorporated into the EIS. The significance of the impacts shall be discussed in terms of subsections (m), (n), (o), and (p).</p>	
E. Kalani Flores	Flores-Case 'Ohana	<p>This analysis is inconsistent with the environmental impacts identified in other EIS for military uses within PTA such as the Record of Decision: Military Training Activities at Mākuā Military Reservation, Hawai'i (see Tables 5 &amp; 6). Particularly, the impacts to biological and cultural resources of military activities at PTA were identified as being a "significant impact." So how can impacts of these military activities that are occurring in the State-leased lands as shown in the photos below be considered less than significant in this DEIS?</p>	<p>The Proposed Action, alternatives, and existing conditions at Makua Military Reservation are different from those at PTA; hence, the potential impacts are different. The potential impacts from continuation of actions in the photographs provided are analyzed in the EIS.</p>
E. Kalani Flores	Flores-Case 'Ohana	<p>New oral histories compiled for this report were limited to only seven individuals. The conclusions presented in this report regarding TCPs and PTRCIs and their NRHP eligibility lacked any Section 106 consultation with Native Hawaiian organizations and other interested groups and individuals. A compilation of oral histories, particularly as conducted for this report when the actual interview transcripts are analyzed, does not constitute Section 106 consultation.</p>	<p>Since the Proposed Action is an administrative action, which is not the type of undertaking that has the potential to cause an effect on historic properties, Section 106 consultation regarding the proposed action is not required. Section 5.3.1 notes that ongoing activities facilitated by the Proposed Action have established mitigation measures through the 2018 Programmatic Agreement executed with SHPD and the Advisory Council on Historic Preservation. Section 5.3.2 discusses that compliance with Chapter 6E would occur after the EIS process.</p>

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
			EIS Section 3.4.2 explains that separate Section 106 consultation is also conducted for other activities that fall outside the parameters of the 2018 Section 106 PA for PTA.
E. Kalani Flores	Flores-Case 'Ohana	Also, a number of potential cultural sites that were considered eligible for nomination to NRHP were dismissed from further consideration despite having significance and integrity. This was done due to a lack of information such as site maps or improper documentation that was not included in the scope of work for this report. This is another example of the inadequate assessments of cultural resources within PTA (see pp. 3-5).	Since the Proposed Action is an administrative action, which is not the type of undertaking that has the potential to cause an effect on historic properties, Section 106 consultation regarding the proposed action is not required. Section 5.3.1 notes that ongoing activities facilitated by the Proposed Action have established mitigation measures through the 2018 Programmatic Agreement executed with SHPD and the Advisory Council on Historic Preservation. Section 5.3.2 discusses that compliance with Chapter 6E would occur after the EIS process. EIS Section 3.4.2 explains that separate Section 106 consultation is also conducted for other activities that fall outside the parameters of the 2018 Section 106 PA for PTA.
E. Kalani Flores	Flores-Case 'Ohana	Consequently, the failure to properly complete an adequate CIA and appropriate assessment of TCPs and PTRCIs, the Army is not capable of accurately assessing the effects on cultural resources and associated cultural practices.	Since the Proposed Action is an administrative action, which is not the type of undertaking that has the potential to cause an effect on historic properties, Section 106 consultation regarding the proposed action is not required. Section 5.3.1 notes that ongoing activities facilitated by the Proposed Action have established mitigation measures through the 2018 Programmatic Agreement executed with SHPD and the Advisory Council on Historic Preservation. Section 5.3.2 discusses that compliance with Chapter 6E would occur after the EIS process.  EIS Section 3.4.2 explains that separate Section 106 consultation is also conducted for other activities that fall outside the parameters of the 2018 Section 106 PA for PTA.
E. Kalani Flores	Flores-Case 'Ohana	It's also suggested to not superimpose place names on older maps if they aren't actually on those maps. It makes it difficult to view these maps within their historical context (e.g. Figures 3 & 4). Also, some of the superimposed names are in the wrong locations. Names should only be superimposed on the map if it is difficult to	This comment was submitted during the first Draft EIS public comment period, provided a response, and resubmitted during the second Draft EIS public comment period.  The OEQC guidelines note that historic maps should be

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>read. If the CIA had a combined table/list of place names, then it could include one map locating all these place names by either a number or actual name. Likewise, unnamed pu'u and other geological features/cultural resources should also be identified on this map. The CIA failed to include a listing of all known Hawaiian plants found in PTA. This plant list in Table 9 only includes endangered or threatened plants. Similarly, the plant list in the DEIS is also incomplete. We concur that pu'u (hilltops, cinder cones) are a significant part of the cultural landscape within PTA and surrounding areas as noted in the CIA.</p>	<p>included in a CIA. The maps have been revised to distinguish PTA boundaries and the broad geographical area established for the analysis. Pu'u names were sourced from the historic maps and informant interviews.</p> <p>The CIA was revised in the Second Draft EIS to include native plants documented on State-owned land at PTA.</p>
E. Kalani Flores	Flores-Case 'Ohana	<p>The references to Ka'ohē Mauka and Pā'āuhau Mauka/Makai as being ahupua'a is incorrect as substantiated by early Mahele records, survey accounts, and maps that reference these traditional ahupua'a without the terms "Mauka" or "Makai." Neither is this a "modern ahupua'a designation." Instead, the use of these terms misidentifies and misconstrues the actual names of these ahupua'a. The terms "Upper" and "Mauka" didn't appear on the maps until after 1900, not as the name of these ahupua'a, but instead were used as a reference to the inland portions of these ahupua'a. This is similar to how the directional terms of "uka" and "kai" were used when referencing different portions of an ahupua'a. However, the use of these terms did not change the actual original names of these ahupua'a.</p>	<p>Ahupua'a names were sourced from the Hawaii Statewide GIS Program, sourced from Office of Hawaiian Affairs (2009); various corrections made by DLNR, SHPD - 2017, 2021, 2024.</p>
E. Kalani Flores	Flores-Case 'Ohana	<p>Some of the information pertaining to the Mahele in the ALR is inaccurate. The lands of Ka'ohē and Humu'ula were not "awarded" to Victoria Kamamalu. They were initially "claimed" on her behalf and then relinquished as part of her commutation. In addition, Ka'ohē was not "designated as Crown Lands" during the Mahele. After this ahupua'a was relinquished by Victoria Kamamalu, then it became Government Lands of the Hawaiian Kingdom. Likewise, Humu'ula was not "initially designated as Crown Lands" during the Mahele. Instead this ahupua'a was relinquished by Victoria Kamamalu and it then became Crown Lands after Kamehameha III retained it as part of his inventory of lands.</p>	<p>This comment was submitted during the first Draft EIS public comment period, provided a response, and resubmitted during the second Draft EIS public comment period. The ALR was revised for the Second Draft EIS.</p>

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
E. Kalani Flores	Flores-Case 'Ohana	Narratives are inadequate to fully describe the environment and landscape of PTA. Why weren't sufficient photos included in both the CIA and DEIS? Furthermore, these photos should identify the locations and names (if known) of the pu'u, mauna, lava flows, caves, gulches and other features by superimposing the names on the photos similar to what was done on the maps in this report.	Photos are not a specific content requirement under NEPA or HEPA. Where helpful and to the extent practicable for the EIS and CIA, photos have been included.
E. Kalani Flores	Flores-Case 'Ohana	Information from the ethnographic study by Social Research Pacific, Inc., Final Draft Report: Planning Level Oral History Survey of Traditional Cultural Properties on U.S. Army Pohakuloa Training Area, Hawai'i Island, Hawai'i, (July 9, 2005) appears missing from the ALR and CIA. [See attached copy.]	Thank you for your comment.
E. Kalani Flores	Flores-Case 'Ohana	The CIA fails to clearly define "the Study Area." Throughout the CIA, there is an inconsistency of what area is being assessed with convoluted references to the "Region of Influence," "Project Area," "Geographic Extent," and "Study Area." Although the CIA states the following, the Study Area is depicted in Figure 5 as only the PTA area.	This comment was submitted during the first Draft EIS public comment period, provided a response, and resubmitted during the second Draft EIS public comment period. The CIA has been revised for the Second Draft EIS to clarify the project area and broad geographical area.
E. Kalani Flores	Flores-Case 'Ohana	Likewise, the DEIS failed to assess the adverse impacts of the military's actions and live-fire training activities at PTA upon the intergenerational trauma and well-being of Kanaka Maoli.	Discussion of the impacts on communities with environmental justice concerns from the Army's historical and current presence and mission activities is provided in Section 3.11.6.
E. Kalani Flores	Flores-Case 'Ohana	Within PTA is an artillery impact area of 51,000 acres that has been so heavily bombarded for nearly 80 years that it is considered an extremely hazardous zone because it contains a significant amount of unexploded ordnance (referred to as MEC/UXO).	Please see General Response 1.
E. Kalani Flores	Flores-Case 'Ohana	Based upon our personal experience, it's very evident that the U.S. Army and State have systematically ignored community and Kanaka Maoli comments and concerns regarding the adverse impacts of military activities within an environmentally and culturally sensitive landscape of the saddle region. This has also resulted in detrimental impacts upon our cultural practices and traditions associated with this area.	Please see updated Sections 3.4 and 3.11 of the EIS for information on historic and cultural resources, cultural practices, and environmental justice; and Appendix I (CIA).  Section 3.4.4.6 has been revised to clarify that outreach and engagement with cultural practitioners and NHOs is an ongoing, existing management measure.
E. Kalani Flores	Flores-Case 'Ohana	LACKS COMPREHENSIVE REVIEW OF CULTURAL RESOURCES The analysis of cultural resources in this DEIS is inadequate and incomplete as the ROI for the historic	OEQC guidelines recommend a geographic extent beyond the identified or typical boundaries of the geographic project area for cultural practices. NEPA and HEPA do not

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		and archaeological resources was reduced to only the State-leased lands and not the entire geographic extent of PTA as required by the NEPA and HEPA regulatory framework and laws.	require the ROI to extend outside the geographic project area of the Proposed Action for historic and cultural resources.
E. Kalani Flores	Flores-Case 'Ohana	There has been a piecemeal approach, thus avoiding an appropriate analysis of the cumulative impacts upon the historic sites and cultural resources of this area. According to a 2018 Programmatic Agreement (2018 PA), the identification of potential historic properties through intensive pedestrian archaeological surveys have only been conducted on about 45% of the accessible land (approximately 81,000 acres outside of the high hazard Impact Area) at PTA. As of the signing of this 2018 PA, only about 31% of the identified archaeological type properties at PTA had been evaluated for NRHP eligibility. The remaining 69% of known archaeological properties distributed across the accessible land were to be treated as eligible for the NRHP and adverse effects avoided in accordance with AR 200-1 Part 6-4(b)(9).	Section 3.4.4.6 discusses the Army's CRM Program at PTA, including the State-owned land. Previous archaeological surveys are provided in Table 3-14 of the EIS. Section 3.4.4.3 discusses why portions of State-owned land have not been surveyed.
E. Kalani Flores	Flores-Case 'Ohana	The ALR has omitted significant figures under the false pretense that it's sensitive information. How can maps showing survey coverage of previous archaeological studies be considered sensitive? (See Figures 10- 13.) Figure 10 Overview map showing survey coverage of previous archaeological studies within the project area. Figure 11 Detail map 1 showing archaeological studies within the project area. Figure 12 Detail map 2 showing archaeological studies within the project area. Figure 13 Detail map 3 showing archaeological studies within the project area. Likewise, other omitted figures removed significant information from this review. (See Figures 14- 18.) Figure 14. Overview map showing archaeological sites within the project area. Figure 15. Detail map showing archaeological sites within the project area. Figure 16. Detail map 2 showing archaeological sites within the project area. Figure 17. Detail map 3 showing archaeological sites within the project area. Figure 18. Detail map 4 showing archaeological sites within the project area Without the ability to review these omitted maps, the public doesn't have the ability to make	Section 3.4.4.6 discusses the Army's CRM Program at PTA, including the State-owned land. It is Army practice to protect the location of sensitive sites. Previous archaeological surveys are provided in Table 3-14 of the EIS. Section 3.4.4.3 discusses why portions of State-owned land have not been surveyed.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		adequate and thorough comments pertaining to the potential impacts upon the cultural resources within PTA. Updated copies of these maps should be included in the EIS.	
E. Kalani Flores	Flores-Case 'Ohana	It appears that this DEIS is failing to disclose that a large portion of the previously surveyed area within the State-leased lands has identified "Archaeologically Sensitive Areas" with numerous "Recorded Archaeological Sites."	Section 3.4.4.6 discusses the Army's CRM Program at PTA, including the State-owned land. Previous archaeological surveys are provided in Table 3-14 of the EIS. Section 3.4.4.3 discusses why portions of State-owned land have not been surveyed.
E. Kalani Flores	Flores-Case 'Ohana	SUMMARY OF COMMENTS: The Flores-Case 'Ohana provided substantive oral and written comments of nearly 40 pages plus attachments regarding the first ATR DEIS which were systematically ignored. [See pp. I-89 to I-278] The responses to our comments were extremely inadequate and inaccurate with just broad 'boilerplate' responses. [See pp. D-86 to D-97] Therefore, our previous comments (dated June 1, 2022) have been resubmitted for this second draft. Overall, the DEIS is still incomplete, inadequate, deficient, and fails to be in compliance with the National Environmental Policy Act (NEPA) and Hawaii Environmental Policy Act (HEPA) as well as other relevant rules and statutes.	Please see General Response 1.
E. Kalani Flores	Flores-Case 'Ohana	There is no evidence that demonstrates a Section 106 consultation with NHOs has been conducted for this DEIS. Instead, the U.S. Army is attempting to apply a previously limited Section 106 process that was specific to only a 2018 PA that was primarily done for the development and operation of the Infantry Platoon Battle Course (IPBC) at PTA. It's also contended that the proposed undertaking for this DEIS falls outside of the scope of the afore-mentioned 2018 PA and as such would require a Section 106 process as stipulated in this PA: STIPULATIONS The USAG-Pōhakuloa Garrison Commander and the USAG-HI Garrison Commander shall ensure that the following stipulations are implemented: I. GENERAL E. USAG-Pōhakuloa shall follow the standard Section 106 process defined in Subpart B of 36 CFR Part 800 for undertakings that fall outside the scope of this PA (and other applicable agreements), or shall seek an amendment under	Since the Proposed Action is an administrative action, which is not the type of undertaking that has the potential to cause an effect on historic properties, Section 106 consultation regarding the proposed action is not required. Section 5.3.1 notes that ongoing activities facilitated by the Proposed Action have established mitigation measures through the 2018 Programmatic Agreement executed with SHPD and the Advisory Council on Historic Preservation. Section 5.3.2 discusses that compliance with Chapter 6E would occur after the EIS process. EIS Section 3.4.2 explains that separate Section 106 consultation is also conducted for other activities that fall outside the parameters of the 2018 Section 106 PA for PTA.

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
		Stipulation IV.C. to bring the activity within the scope of the PA.	
E. Kalani Flores	Flores-Case 'Ohana	Past actions at PTA have had less than significant impacts on historic and cultural resources, and significant, adverse impacts on cultural practices. The action alternatives would have the same continued impacts and new, less than significant impacts. Impacts of present and reasonably foreseeable future actions would vary from no impacts to beneficial impacts. The action alternatives, when combined with past, present, and reasonably foreseeable future actions, would result in less than significant cumulative impacts on historic and cultural resources and significant cumulative impacts on cultural practices for lease and fee simple title. (4.4.3, p. 4-11).	Please see General Response 1.
E. Kalani Flores	Flores-Case 'Ohana	Based upon how the DEIS has been improperly drafted twice, there is a lack of confidence in this environmental review process.	Please see General Response 1.
E. Kalani Flores	Flores-Case 'Ohana	Conclusively, the U.S. Army, State Board of Land and Natural Resources (BLNR), and Department of Land and Natural Resources (DLNR) have failed their affirmative duty and legal obligations to protect the biological and cultural resources, public land trust, and rights/practices of the public and Kanaka Maoli (aka Native Hawaiians) associated with PTA.	Please see General Response 1.
E. Kalani Flores	Flores-Case 'Ohana	This DEIS doesn't comply with the requirements of HEPA that explicitly stipulates that EISs must disclose any adverse effects on cultural resources or traditional cultural practices. DoDI 4715.16 (2008) defines a Traditional Cultural Property (TCP) as a cultural resource.	Section 3.4 discusses impacts to historic and cultural resources and cultural practices. Appendix A of the EIS contains a NEPA-HEPA Compliance Table that outlines the rules and the EIS section in which those rules are addressed.
E. Kalani Flores	Flores-Case 'Ohana	It is very apparent that the U.S. Army and its affiliates are either ignoring or ignorant of this understanding because they are going to push ahead with their plans to cause further adverse and irreversible impacts upon the cultural and natural resources resulting from this undertaking. Despite what has been documented in previous reports as well as community opposition and substantive comments provided in this environmental review process, the U.S. Army is still	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		going to pursue their preferred alternative. [May 30, 2024]	
E. Kalani Flores	Flores-Case 'Ohana	RECOMMENDATION The Flores-Case 'Ohana recommends the No Action Alternative based upon the previously stated comments as well as the following reasons: The live-fire exercises are adversely impacting the 'āina, the water aquifer, and the energetic piko of Moku o Keawe. * The U.S. Army would further contribute to the intergenerational trauma and negative well-being of Kanaka Maoli with the bombing of our Papahānaumoku. *Dispossession of Kanaka Maoli from their homelands remains a primary issue threatening their identity and well-being.	Please see General Response 1.
E. Kalani Flores	Flores-Case 'Ohana	An essential aspect of Kanaka Maoli (Native Hawaiian) beliefs and customary practices is the cultural perspective of aloha 'āina (deep love, reverence, and respect for the land). It's an understanding that humanity is intimately connected to Papahānaumoku (Earth Mother) and thus strive to live in lōkahi (harmony) with her because humans are merely the caretakers of the land that maintains their life and nourishes their souls. Therefore, the 'āina is considered sacred. In particular, Pōhakuloa encompasses a sacred landscape that is interconnected with the mountains of Mauna a Wākea, Mauna Loa, and Hualalai. Also, the energetic piko of Hawai'i Island is centered within Pōhakuloa. Past and ongoing military operations and activities at Pōhakuloa have caused severe desecration, destruction, and disruption to the physical environment and natural energy fields on this island. Furthermore, the war associated activities imprint an energetic disturbance in the area that also adversely impacts ancestral akua, 'aumakua, kupua, kia'i and others connected to the area of Pōhakuloa. These types of activities create a physical and spiritual disturbance, disconnection, and imbalance between man and the Creator, and between man and his environment. Consequently, the proposed continued activities and live-fire training on state-leased lands, would further contribute to the desecration and destruction of this land and everything and everyone connected to it at various	Section 3.4.4.4 provides a summary of Native Hawaiian beliefs obtained from interviewees and survey respondents. These informants noted the sacredness of Pōhakuloa. Individuals were interviewed for information on cultural resources, practices, and beliefs occurring within or associated with the project area and broad geographical area. All survey responses and interview summaries can be found in the Cultural Impact Assessment in Appendix I. The No Action Alternative is analyzed in 3.4.6.4.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>levels and dimensions. Therefore, from a cultural perspective, there are truly no mitigation measures that would compensate for the proposed undertaking. Truly, the No Action Alternative should be selected when one examines the cumulative significant, substantial, and adverse impacts resulting from military activities that have occurred over seventy years at Pōhakuloa.</p>	
E. Kalani Flores	Flores-Case 'Ohana	<p>Continued live-fire exercises would compound the problem to properly clean-up the UXO in the impact area in the future as demonstrated with the inability to clean-up Kaho'olawe. In addition, these exercises would contribute further to pollutant migration and the introduction of additional weapons related contaminants to soil and water already contaminated by military activities.</p>	<p>Impacts to geology, topography and soils are analyzed and discussed in Section 3.8; impacts to water resources are analyzed and discussed in Section 3.9.</p>
E. Kalani Flores	Flores-Case 'Ohana	<p>Firstly, the proposed continued military operations at PTA are not an allowable use for this conservation district per HRS Chapter 183C and HAR Chapter 13-5. Also, military use is not in alignment with the purpose of land use in a conservation district as noted below.</p>	<p>Compliance with HAR Chapter 13-5, Conservation District, has been revised and is discussed in Sections 1.4.2 and 5.3.2. Sections 1.4.2, 3.2, and 5.3.2 have also been revised to make clear that for analysis purposes, the EIS assumes BLNR would establish a special subzone in the conservation district through a rule amendment that allows for military training use.</p> <p>Such a special subzone would be novel and represents a departure from current Conservation District uses.</p>
E. Kalani Flores	Flores-Case 'Ohana	<p>The State of Hawai'i doesn't have legal title to transfer ownership or exchange lands that were illegally 'ceded' to the U.S. Furthermore, Kanaka Maoli never directly relinquished their claims to their Hawaiian national lands.</p>	<p>Please see General Response 1.</p>
E. Kalani Flores	Flores-Case 'Ohana	<p>The U.S. Army has failed to justify the use of PTA by developing and implementing a process to update periodically its strategic plan—Range and Training Land Strategy—to reflect current training needs and provide a comprehensive assessment of the Army's total land requirements in the Pacific including other installations beyond the Pacific. Army guidance for the acquisition of training land should provide overall guidance for Army installations and be in alignment with DOD policy by requiring Army installations to, among other things,</p>	<p>Section 1.1.3 of the EIS provides a discussion of the planning for retention of State-owned land at PTA, including the Environmental Condition of Property (ECOP), Analysis of Alternatives Study, and the Major Land Acquisition Waiver from the Under Secretary of Defense for Acquisition and Sustainment.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>evaluate the economic feasibility of each alternative for all potential training land acquisition projects. In addition, the regulation requires an assessment of anticipated environmental impacts and requires that Army installations develop a major land acquisition proposal document that includes, where applicable, a summary of the feasibility analysis as well as a list of potential environmental impacts that must be submitted to the Under Secretary of Defense for Acquisition, Technology, and Logistics before an installation issues any official notices to the public. It's contended that this DOD policy has not not been followed with this DEIS process.</p>	
E. Kalani Flores	Flores-Case 'Ohana	<p>Pursuant to the Admission Act of 1959, Section 5(f), the military use of these public lands isn't one of the five trust purposes, "The lands granted to the State of Hawaii by subsection (b) of this section and public lands retained by the United States under subsections (c) and (d) and later conveyed to the State under subsection (e), together with the proceeds from the sale or other disposition of any such lands and the income therefrom, shall be held by said State as a public trust for the support of the public schools and other public educational institutions, for the betterment of the conditions of native Hawaiians, as defined in the Hawaiian Homes Commission Act, 1920, as amended, for the development of farm and home ownership on as widespread a basis as possible for the making of public improvements, and for the provision of lands for public use. Such lands, proceeds, and income shall be managed and disposed of for one or more of the foregoing purposes in such manner as the constitution and laws of said State may provide, and their use for any other object shall constitute a breach of trust for which suit may be brought by the United States. The schools and other educational institutions supported, in whole or in part out of such public trust shall forever remain under the exclusive control of said State; and no part of the proceeds or income from the lands granted under this Act shall be used for the support of any sectarian or denominational school, college, or university."</p>	<p>A discussion of ceded lands is provided in Section 3.2.4.1. Section 1.4 provides the scope of the EIS, which includes a description of the Proposed Action, retention of State-owned land by the Army (an administrative action). The analysis of the Proposed Action therefore does not include a decision on the methods of retention.</p>

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
E. Kalani Flores	Flores-Case 'Ohana	The U.S. Army does not have the free, prior, and informed consent of Kanaka Maoli to inflict further damage and harm to these lands. The importance of consent is affirmed in the UN Declaration on the Rights of Indigenous Peoples.	Please see General Response 1.
E. Kalani Flores	Flores-Case 'Ohana	The U.S. military's actions and lack of transparency in Hawai'i and abroad have resulted in the public's distrust as demonstrated with the matters pertaining to the threat to Honolulu's water supply due to the Red Hill contamination, health risks of DU use in Hawai'i, unexploded ordnance in Waikoloa Maneuver Area, Makua Valley degradation, telescopes on Haleakalā, bombing of Kaho'olawe, etc., (the list could fill several pages).	Please see General Response 1.
E. Kalani Flores	Flores-Case 'Ohana	In addition, the military use of these public lands are in violation of the public trust and the Hawai'i State Constitution, Article XII, Section 4 – "The lands granted to the State of Hawaii by Section 5(b) of the Admission Act and pursuant to Article XVI, Section 7, of the State Constitution, excluding therefrom lands defined as "available lands" by Section 203 of the Hawaiian Homes Commission Act, 1920, as amended, shall be held by the State as a public trust for native Hawaiians and the general public."	The analysis of land use in Section 3.2.6 discusses impacts of the Proposed Action on land tenure, noting that "there would be a continued, long-term, negligible, adverse impact on land tenure due to the continued military use of the public trust land, which some believe is incompatible with the public trust purposes."
E. Kalani Flores	Flores-Case 'Ohana	SUMMARY OF COMMENTS: The Flores-Case 'Ohana provides the following substantive comments to this Draft Environmental Impact Statement (DEIS). Overall, the DEIS is incomplete, inadequate, deficient, and fails to be in compliance with the National Environmental Policy Act (NEPA) and Hawaii Environmental Policy Act (HEPA) as well as other relevant rules and statutes. This DEIS fails to accurately describe the affected environment by limiting the Region of Influence (ROI) and the scope of discussion regarding certain resources to only the parcels of State-leased lands by excluding the other adjacent and relevant lands of the Pōhakuoloa Training Area (PTA). Thus, the environmental consequences lack a thorough discussion of the environmental effects and their significance.	Appendix A of the EIS contains a NEPA-HEPA Compliance Table that outlines the rules and the EIS section in which those rules are addressed. The EIS also provides mitigation measures, SOPs and BMPs adhered to by the Army as defined in previous NEPA-HEPA documents in Appendix E. Additionally, each Chapter 3 resource section provides an analysis where effects may vary based on retention estate (fee simple title and lease). Each resource area in Chapter 3 provides a subsection on the identified Region of Influence for the resource analysis, including the rationale for how the Region of Influence was established.
E. Kalani Flores	Flores-Case 'Ohana	Conclusively, the U.S. Army, State Board of Land and Natural Resources (BLNR), and Department of Land and Natural Resources (DLNR) have failed their affirmative	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>duty and legal obligations to protect the biological and cultural resources, public land trust, and rights/practices of the public and Kanaka Maoli (aka Native Hawaiians) associated with PTA.</p>	
E. Kalani Flores	Flores-Case 'Ohana	<p>BACKGROUND Members of the Flores-Case 'Ohana have engaged in Kanaka Maoli (Native Hawaiian) traditional and customary practices within PTA and the surrounding areas stretching from Mauna Loa to the summit of Mauna a Wākea and further to the east at Ahua'umi. These practices included, but were not limited to, making pilgrimages, conducting ceremonies, collecting wai/hau/kinolau of Poliahu and Waiau as well as Kahoupookāne, erecting ahu/ki'i/hale, placing of ho'okupu, offering pule/oli/mele/hula, receiving 'ike kupuna, connecting with akua/kupua/kupuna, kilo hōkū, depositing 'iewe, gathering pōhaku, collecting lā'au for ceremonies/medicine/lei-making, engaging in activities of aloha 'āina and malama 'āina, etc. Members of the Flores-Case 'Ohana have also participated at the various levels of the public review processes pertaining to PTA such as attending meetings and submitting testimony dating back to at least two decades.</p>	Please see General Response 1.
E. Kalani Flores	Flores-Case 'Ohana	<p>The following is a partial listing of issues of concern/proposed undertaking at PTA that we have commented upon: *Proposed Fencing Project on Pu'u Koli (letter dated 23 July 2011) * PTA High-Altitude Mountainous Environmental Training (HAMET) EA [December 2010] *Pōhakuloa Training Area (PTA) Draft Programmatic Environmental Impact Statement (PEIS) [October 2011] *Section 106 Consultation with Native Hawaiian Organizations and individual NativeHawaiians regarding undertakings by the U.S. Army at Pōhakuloa Training Area (PTA) *Final Environmental Impact Statement (FEIS) for the Construction and Operation of an Infantry Platoon Battle Course (IPBC) at Pōhakuloa Training Area (PTA), Hawai'i [March 2013] * Hawaiian Goose Conservation Fencing Project (referenced in letter from PTA Commander, July 10, 2013) *Training Area 21 Fencing Project (referenced in letter from PTA Commander, March 10, 2013) *Trail &amp; Landing Zone</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>Construction (referenced in letter from PTA Commander, July 16, 2013) * Urban Close Air Support &amp; Aviation Bulls-Eye Range (referenced in letter from PTA Commander, July 3, 2013) * Popo’o Makai Trail/Power Line Trail (referenced in two separate letters from PTA Commander, May 23, 2013) * Bridge Bypass Trail (referenced in letter from PTA Commander, May 21, 2013) * Detonating Unexploded Ordnance (referenced in Letter from PTA Commander, July 1, 2013) * Lineal and/or Cultural Affiliation Claimant for Iwi found at the U.S. Army at Pōhakuloa Training Area (PTA) [October 2012] * Programmatic Agreement MV-22 &amp; H-1 Aircraft of Marine Expeditionary Elements in Hawai’i * Programmatic Agreement Infantry Platoon Battle Course (IPBC) at Pōhakuloa Training Area (PTA) [June 1, 2022]</p>	
E. Kalani Flores	Flores-Case ‘Ohana	<p>In addition, E. Kalani Flores served on the Pōhakuloa Training Area (PTA) – Cultural Advisory Committee (CAC) since its inception in 2002 through several base commanders until he was dismissed in July 2013 by the PTA commander after being included in a film entitled Pōhakuloa: Now that you know. Do you care? [June 1, 2022]</p>	Please see General Response 1.
E. Kalani Flores	Flores-Case ‘Ohana	<p>PTA, under the control of the US Army, is the largest live-fire range and training complex (132,000 acres) in Hawai’i or anywhere in the Pacific region. [June 1, 2022]</p>	Please see General Response 1.
E. Kalani Flores	Flores-Case ‘Ohana	<p>It has been well documented and reported by various news outlets such as Mint Press News (MNP) that the U.S. Department of Defense has left its toxic legacy throughout the world in the form of depleted uranium, oil, jet fuel, pesticides, defoliants like Agent Orange and lead, among others, producing more hazardous waste than the five largest U.S. chemical companies combined.1 MPN also noted, “U.S. military bases, both domestic and foreign, consistently rank among some of the most polluted places in the world, as perchlorate and other components of jet and rocket fuel contaminate sources of drinking water, aquifers, and soil. Hundreds of military bases can be found on the Environmental Protection Agency’s list of Superfund sites, which qualify for clean-up grants from the government. Almost 900 of the nearly 1,200 Superfund sites in the U.S. are abandoned military facilities or sites</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>that otherwise support military needs, not counting the military bases themselves.” Severe damage from military activities is unnerving such as an Air Force contractor dumping industrial solvent trichloroethylene (TCE) into the water table for 29 years in Tucson, AZ which caused over 1,350 residents to suffer from cancer and other illnesses. For over three decades, the Marine Corps Base Camp Lejeune in North Carolina contaminated the groundwater with harmful chemicals resulting in an undetermined number of servicemen and others contracting cancer and other ailments. Also, we have recently witnessed the Navy’s fuel storage tanks at Red Hill, poisoning a major water aquifer on O’ahu.</p>	
E. Kalani Flores	Flores-Case ‘Ohana	<p>What is presently happening at PTA is what was happening on the island of Kaho’olawe when it was used for live-firing training and as a bombing target by the U.S. Navy and other military forces. Except that the size of PTA is nearly four times as large as Kahoolawe. Despite several decades and \$400 million in funding, it was impossible to clear Kaho’olawe of unexploded ordnance. (see figures below) So what is the estimated cost to clean up the State-leased lands and the entire PTA? How will the military be able to clean up PTA if it couldn’t even clean up the smaller acreage of Kaho’olawe?</p>	Please see General Response 1.
E. Kalani Flores	Flores-Case ‘Ohana	<p>For those who still remember, it was also a time when kanaka such as George Helm, Jr. and others spoke out that we are connected to the ‘āina and that such desecration should not continue. His message was simple, “We are in a revolution of consciousness. What we are looking for is the truth. There is man, and there is the environment. One does not supercede the other. Man is merely the caretaker of the land, that maintains his life and nourishes his soul. The land is sacred. The church of life is not in a building, it is in the open sky, the surrounding ocean, and the beautiful soil.” This was his philosophy which serves as a reminder that the health of our ‘āina is directly connected to the health of our people.</p>	Please see General Response 1.
E. Kalani Flores	Flores-Case ‘Ohana	<p>CULTURAL SIGNIFICANCE We are Kanaka Maoli cultural practitioners who have conducted and continue to engage in ceremonies at Pōhakuloa.2 An essential aspect of</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>Kanaka Maoli beliefs and customary practices is the cultural perspective of aloha ‘āina (deep love, reverence, and respect for the land). It’s an understanding that humanity is intimately connected to Papahānaumoku (Earth Mother), and thus we strive to live in lōkahi (harmony/balance) with her because humans are merely the caretakers of the land that maintains our life and nourishes our souls. Therefore, the ‘āina is considered sacred and is very conscious of the impacts inflicted upon it. Situated within a sacred space held between Mauna a Wākea, Mauna Loa and Hualālai is a key cultural, energetic, and spiritual area in the center of Hawai‘i Island. There are significant cultural and historic sites within this landscape. Ancestral guardians of this land have made their presence known and shared ‘ike kupuna (ancestral insight and knowledge) regarding the energetic piko of our Moku o Keawe (Hawai‘i Island). In earlier times, there was a group of elderly men who would walk along these energy lines that run east-west and north-south, intersecting at Pu‘u Koli within PTA, in addition to an energy line that encircles the entire island. Our kupuna walked upon these lines of energy because they knew the significance of maintaining them. Lines such as these are part of the energy grids that sustain the vitality and health at many different levels for this island and its people. (footnote 2: Although the wahi pana of Pōhakuloa doesn’t actually encompass the entire area of PTA, this name is at times used in reference to PTA.)</p>	
E. Kalani Flores	Flores-Case ‘Ohana	<p>Unfortunately, the U.S. military’s undertakings at PTA, especially with the live-fire training, military operations, and construction activities are causing a severe disturbance and desecration to the land and everything and everyone connected to it at various levels and dimensions. Likewise, the proposed land retention would continue to contribute further to this disturbance and desecration. Besides the obvious physical destruction that is occurring at PTA, there is also an energetic vibration of warfare/killing/hostility/destruction that is adversely impacting this island as the result of the military activities in this area. Our individual or collective actions are either</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
		in lōkahi (harmony) with all of these conscious elements and life forms of the Creator or we are in disharmony.	
E. Kalani Flores	Flores-Case 'Ohana	The U.S. Army is not in compliance with the National Historic Preservation Act (NHPA). A comprehensive archaeological inventory survey for PTA including the State-leased lands has failed to be conducted. This has resulted in a number of eligible historic properties not being nominated to the National Register of Historic Places (NRHP). Also, the U.S. Army has failed to complete an accurate assessment of traditional Cultural Properties (TCPs) and properties of traditional religious and cultural importance (PTRCIs) to Native Hawaiians within PTA. In addition, a required Section 106 consultation process has not been done for this DEIS.	<p>Since the Proposed Action is an administrative action, which is not the type of undertaking that has the potential to cause an effect on historic properties, Section 106 consultation regarding the proposed action is not required. Section 5.3.1 notes that ongoing activities facilitated by the Proposed Action have established mitigation measures through the 2018 Programmatic Agreement executed with SHPD and the Advisory Council on Historic Preservation. Section 5.3.2 discusses that compliance with Chapter 6E would occur after the EIS process.</p> <p>EIS Section 3.4.2 explains that separate Section 106 consultation is also conducted for other activities that fall outside the parameters of the 2018 Section 106 PA for PTA.</p>
E. Kalani Flores	Flores-Case 'Ohana	Upon examination of this Archaeological Literature Review (ALR), it's very apparent that over the past several years, the U.S. Army has only done project specific archaeological inventory surveys and failed to complete a comprehensive archaeological inventory survey for the entire PTA.	Section 3.4.4.6 discusses the Army's CRM Program at PTA, including the State-owned land. Previous archaeological surveys are provided in Table 3-14 of the EIS. Section 3.4.4.3 discusses why portions of State-owned land have not been surveyed. The Army is in compliance with the 2018 Programmatic Agreement which applies to both U.S. Government-owned and State-owned land. Stipulations in the Programmatic Agreement require survey of areas with planned development. Recent development has been focused on U.S. Government-owned lands.
E. Kalani Flores	Flores-Case 'Ohana	Similarly, of the approximately 23,000 acres that comprise the State-leased land, inventory surveys have only been conducted on about 52% or 12,050 acres. The remaining 11,920 acres are unsurveyed.	Section 3.4.4.6 discusses the Army's CRM Program at PTA, including the State-owned land. Previous archaeological surveys are provided in Table 3-14 of the EIS. Section 3.4.4.3 discusses why portions of State-owned land have not been surveyed.
E. Kalani Flores	Flores-Case 'Ohana	There aren't any practical reasons why identified archaeological sites and cultural resources couldn't be shown on a map similar to Figure 1-3: Pōhakuloa Training Area Training Areas and Features or Figure 2-1: Training Areas and Facilities on State-Owned Land (DEIS pp. 1-13, 2-3). Especially since previous EISs have included maps	Figures show where surveys have been completed and the general locations and types of sites within State-owned lands.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>that showed archaeological studies and sites within PTA without fully disclosing their precise locations. [See Figures 3.10-3, 3.10-4, &amp; 3.10-5 from the FEIS Military Training Activities at Mākua Military Reservation, Hawai‘i, June 2009. (FEIS MMR 2009)]</p>	
E. Kalani Flores	Flores-Case ‘Ohana	<p>In other documents prepared for the U.S. Army, they have identified ‘Areas of Traditional Importance’ (ATI) that have not been formally evaluated at PTA. These documents also provide an understanding and guidance regarding these types of cultural resources. The following excerpts are from the FEIS MMR 2009: The term ATI is used in this EIS as a broad category encompassing places of traditional cultural importance to native, aboriginal, or local groups. These areas have either been identified through oral testimony or are associated with other cultural or natural components. Some ATI may be formally designated as historic properties. ATI at MMR and PTA may also include cultural landscapes (defined below), properties of traditional religious and cultural importance to a Native Hawaiian group, prehistoric and historic archaeological sites that may include heiau (temple complexes) and burial sites, traditional gathering places and traditional use sites, and sites used for subsistence and other cultural purposes. Other natural resources may have cultural significance, although they can be difficult to specify in terms of location and individual physical properties. Exceptions are where springs, ponds, caves, or other natural features are incorporated into the physical structures of archaeological sites. Other ATI may be specific landforms, such as a mountain peak or large stones that are clearly mentioned in oral traditions. Executive Order 13007 protects Indian and Native Alaskan sacred sites on federal lands, and the same protections have generally been extended by the Army in Hawai‘i to sites considered sacred by Native Hawaiian organizations. ATI may include sacred sites, although they may not necessarily be the same as properties of traditional religious and cultural importance (PTRCIs), which are defined in Section 3.10.5, and they may or may not be eligible for listing on the NRHP[...] Despite this reference,</p>	<p>Since the Proposed Action is an administrative action, which is not the type of undertaking that has the potential to cause an effect on historic properties, Section 106 consultation regarding the proposed action is not required. Section 5.3.1 notes that ongoing activities facilitated by the Proposed Action have established mitigation measures through the 2018 Programmatic Agreement executed with SHPD and the Advisory Council on Historic Preservation. Section 5.3.2 discusses that compliance with Chapter 6E would occur after the EIS process.</p> <p>EIS Section 3.4.2 explains that separate Section 106 consultation is also conducted for other activities that fall outside the parameters of the 2018 Section 106 PA for PTA.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>the ALR only showed one such trail in Figure 5 associated with 'Umi and failed to identify other trails and travel corridors through this region. Also, the identification and narratives of other trails/roadways that would fall under the Highways Act of 1892 are noticeably missing from the reports.</p>	
E. Kalani Flores	Flores-Case 'Ohana	<p>This report was done in a method that is in contradiction to guidelines set forth in Bulletin 38 as noted below (emphasis underlined): Contacting traditional communities and groups An early step in any effort to identify historic properties is to consult with groups and individuals who have special knowledge about and interests in the history and culture of the area to be studied. In the case of traditional cultural properties, this means those individuals and groups who may ascribe traditional cultural significance to locations within the study area, and those who may have knowledge of such individuals and groups. Ideally, early planning will have identified these individuals and groups, and established how to consult with them. As a rule, however, the following steps are recommended. (p. 6) Field inspection and recordation It is usually important to take knowledgeable consultants into the field to inspect properties that they identify as significant. In some cases such properties may not be discernible as such to anyone but a knowledgeable member of the group that ascribes significance to them; in such cases it may be impossible even to find the relevant properties, or locate them accurately, without the aid of such parties. Even where a property is readily discernible as such to the outside observer, visiting the property may help a consultant recall information about it that he or she is unlikely to recall during interviews at a remote location, thus making for a richer and more complete record. (pp. 7-8) Likewise, as noted in the CRM bulletin (Vol. 16, 1993) by Patricia L. Parker (co-author of National Register Bulletin 38): One fundamental difference between traditional cultural properties and other kinds of historic properties is that their significance cannot be determined solely by historians, ethnographers, ethnohistorians,</p>	<p>Since the Proposed Action is an administrative action, which is not the type of undertaking that has the potential to cause an effect on historic properties, Section 106 consultation regarding the proposed action is not required. Section 5.3.1 notes that ongoing activities facilitated by the Proposed Action have established mitigation measures through the 2018 Programmatic Agreement executed with SHPD and the Advisory Council on Historic Preservation. Section 5.3.2 discusses that compliance with Chapter 6E would occur after the EIS process. EIS Section 3.4.2 explains that separate Section 106 consultation is also conducted for other activities that fall outside the parameters of the 2018 Section 106 PA for PTA.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		ethnobotanists, and other professionals. The significance of traditional cultural properties must be determined by the community that values them.	
E. Kalani Flores	Flores-Case 'Ohana	As noted below: The ROI for historic and archaeological resources includes the entire geographic extent of State-owned land within PTA. (DEIS p. 3-42). Even with this ROI being restricted to just the State-leased land, archaeological inventory surveys have not been completed for about 11,920 acres or 48% of these lands. As previously noted, the analysis of the historic and archaeological resources was curtailed in the Archaeological Literature Review. Especially with the extent of military undertakings, live-fire exercises, firing-points, target ranges, and training activities that occur on the State-leased land, the entire geographic extent of State-leased land should have previously been surveyed for cultural resources. Furthermore, in order to completely grasp the cumulative impacts upon the cultural resources, the entire PTA should have been surveyed.	<p>Section 3.4.4.6 discusses the Army's CRM Program at PTA, including the State-owned land. Previous archaeological surveys are provided in Table 3-14 of the EIS. Section 3.4.4.3 discusses why portions of State-owned land have not been surveyed.</p> <p>Figures show where surveys have been completed and the general locations and types of sites within State-owned lands.</p> <p>Section 5.3.1 notes that the Proposed Action would be consistent with the NHPA since ongoing activities facilitated by the Proposed Action have established mitigation measures through the 2018 Programmatic Agreement executed with SHPD and the Advisory Council on Historic Preservation. The PA is a 15-year agreement that will remain in effect until at least 2033.</p> <p>Section 3.4.2 explains that separate Section 106 consultation is also conducted for other activities that fall outside the parameters of the 2018 Section 106 PA for PTA.</p>
E. Kalani Flores	Flores-Case 'Ohana	The ROI for biological resources includes State-owned land leased by the Army and adjacent lands, both Government- and State-owned lands, where population distributions of plants or animals are contiguous. This ROI includes wildlife corridors and areas encompassing habitats that connect to the State-owned land at PTA, which potentially support protected populations.	The wildlife corridors discussion in Section 3.3 provides the most updated available information.
E. Kalani Flores	Flores-Case 'Ohana	The U.S. Army Garrison (USAG) – Hawaii and the USAG – Pōhakuloa are not in full compliance with statutory requirements of Section 106 federal laws and failed to follow the Department of Defense’s policy (DODI 4710.03) and Advisory Council on Historic Preservation (ACHP) Handbook regarding the Section 106 review process with NHOs as it pertains to this DEIS despite the 2018 PA outlining these processes as such: WHEREAS, USAG-	Since the Proposed Action is an administrative action, which is not the type of undertaking that has the potential to cause an effect on historic properties, Section 106 consultation regarding the proposed action is not required. Section 5.3.1 notes that ongoing activities facilitated by the Proposed Action have established mitigation measures through the 2018 Programmatic Agreement executed with SHPD and the Advisory Council

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>Pōhakuloa and USAG-HI recognize the U.S. Department of Defense Instruction Consultation Policy with Native Hawaiian Organizations (DODI 4710.03) and Advisory Council on Historic Preservation (ACHP) Handbook on Consultation with Native Hawaiian Organizations as their guiding principles for consulting with NHOs; Furthermore, the 2018 PA clearly states the significance for the Section 106 consultation process with NHOs as it pertains to undertakings in PTA as such: WHEREAS, the NHPA defines Native Hawaiian Organizations (NHOs) as “any organization which serves and represents the interests of Native Hawaiians; has as a primary and stated purpose the provision of services to Native Hawaiians; and has demonstrated expertise in aspects of historic preservation that are culturally significant to Native Hawaiians” (54 U.S.C. § 300314); and WHEREAS, USAG-Pōhakuloa and USAG-HI acknowledge that NHOs possess special expertise in assessing the eligibility of properties to which they attach religious and cultural significance;</p>	<p>on Historic Preservation. Section 5.3.2 discusses that compliance with Chapter 6E would occur after the EIS process. EIS Section 3.4.2 explains that separate Section 106 consultation is also conducted for other activities that fall outside the parameters of the 2018 Section 106 PA for PTA.</p>
E. Kalani Flores	Flores-Case ‘Ohana	<p>The reference in the DEIS pertaining to the Republic of Hawai‘i assuming ownership of the Crown and Government lands of the Hawaiian Kingdom is inaccurate. These were clearly “stolen lands.” Likewise, the Republic of Hawai‘i was never legally annexed to the United States as a treaty of annexation was never executed and approved with a two-thirds vote of the U.S. Senate in 1898 due to Kanaka Maoli resistance at the time. What occurred in 1898 was just an illusion to secure and occupy Hawai‘i due to its strategic military location in the middle of the Pacific. Note: There are several individuals named Kalani Flores. If the one listed in Table 1 of the CIA is referring to E. Kalani Flores of the Flores-Case ‘Ohana, he isn’t associated with the University of Hawai‘i at Hilo.</p>	<p>Please see General Response 1.</p>
E. Kalani Flores	Flores-Case ‘Ohana	<p>CONCLUSION Comments put forth are specific to the items presented and were not intended as an assessment of all aspects of the DEIS and associated reports as there was insufficient time and resources to do so. The comments presented in this document identify significant deficiencies in this DEIS.</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
E. Kalani Flores	Flores-Case 'Ohana	§183C-1 Findings and purpose. The legislature finds that lands within the state land use conservation district contain important natural resources essential to the preservation of the State's fragile natural ecosystems and the sustainability of the State's water supply. It is therefore, the intent of the legislature to conserve, protect, and preserve the important natural resources of the State through appropriate management and use to promote their long-term sustainability and the public health, safety and welfare. [L 1994, c 270, pt of §1]	Please see General Response 1.
E. Kalani Flores	Flores-Case 'Ohana	Consequently, the proposed Alternatives 1-3, especially with the military activities, firing-points, training areas, and live-fire operations within the State-leased lands, would continue to cause a severe disturbance, destruction, and desecration to the land and everything and everyone connected to it at various levels and dimensions. The analysis pertaining to environmental impacts is considered extremely inaccurate especially when the level of significance for almost all resources is listed as "less than significant" in this DEIS.	Please see General Response 1.
E. Kalani Flores	Flores-Case 'Ohana	It is important to remember that many peoples, including Kanaka Maoli, have a reverential relationship with the living Earth as our 'Mother' or 'Grandmother'. The cultural perspective of mālama 'āina and aloha 'āina, to care for the land and nature with sincere love and respect, is at the heart of Kanaka Maoli cultural traditions and customary practices. For those who are listening, what is our 'āina trying to tell us during these times of change? For us as native people connected genealogically to these lands, when the ancestral guardians and guides call upon us to protect it, that's what we must do, it's our obligation, our privilege, our birthright, our responsibility, our cultural tradition, our kuleana. Everyone is responsible and accountable for their intentions and their actions on these lands. For those who wish to continue to inflict pain and trauma to our beloved island, have you lost your connection to nature? Have you forgotten you are nature?	Please see General Response 1.
E. Kalani Flores	Flores-Case 'Ohana	Furthermore, the U.S. Army was reminded about Section 106 requirements during the public scoping process of this DEIS as noted below. Yet, this Section 106 consultation	Since the Proposed Action is an administrative action, which is not the type of undertaking that has the potential to cause an effect on historic properties,

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>was still not completed. Cultural Resources and Consultation with Native Hawaiian Community The DEIS should document compliance with the National Historic Preservation Act(NHPA). Identify the progress towards identifying archaeological sites in the impact areas and areas of ongoing disturbance. The NHPA requires that, in carrying out the requirements of Section 106, each federal agency must consult with any Native Hawaiian organization that attaches religious and cultural significance to historic properties that may be affected by the agency’s undertakings. We note that the Advisory Council on Historic Preservation has a handbook for consultation with Native Hawaiian organizations in the Section 106 process that may be useful. We recommend the DEIS describe the process and progress of Section 106 consultation between the Army and any Native Hawaiian organizations that have shown an interest in the action, issues that were raised, and how those issues are being addressed in the development of the proposed action and alternatives.6 (Footnote 6: Scoping comments from Karen Vitulano, Environmental Review Branch, U.S. EPA, Region IX. October 8, 2020.)</p>	<p>Section 106 consultation regarding the proposed action is not required. Section 5.3.1 notes that ongoing activities facilitated by the Proposed Action have established mitigation measures through the 2018 Programmatic Agreement executed with SHPD and the Advisory Council on Historic Preservation. Section 5.3.2 discusses that compliance with Chapter 6E would occur after the EIS process.</p> <p>EIS Section 3.4.2 explains that separate Section 106 consultation is also conducted for other activities that fall outside the parameters of the 2018 Section 106 PA for PTA.</p>
E. Kalani Flores	Flores-Case ‘Ohana	<p>Also, these exercises have started wildfires that have adversely impacted endangered and threatened species as well as the natural and cultural resources in this area.</p>	<p>Section 3.3.4 has been updated with more recent scientific data and surveys and wildland fire analysis in Section 3.3.6 has been revised.</p>
E. Kalani Flores	Flores-Case ‘Ohana	<p>OTHER The DEIS is incomplete for failing to provide a complete analysis of several other potential alternatives by reducing it to just Alternatives 1-3. Likewise, training sites outside of Hawai’i are not identified as an alternative. In addition, there is no analysis for the use of blank and non-explosive munitions for military training. artillery, mortar, and rocket systems to mitigate the extremely adverse and destructive live-firing activities. Also, there is no disclosure as to what the U.S. Army intends to pay for the lease of State lands it plans to retain as part of the alternatives as well as how much it would cost to completely clean-up those lands not retained. The DEIS is incomplete for failing to identify the specific types of military activities that occur in each of the training areas in order for the public to make adequate comments in</p>	<p>Section 1.2 provides information on the strategic importance of Hawai’i for national defense and PTA’s role. Locations outside of the State-owned land at PTA and alternative training scenarios (e.g., computer-based simulation training) do not address the purpose and need of the Proposed Action, do not meet the screening criteria, and were previously considered (see Sections 1.1.3 and 2.2.6).Sections 2.2.5 and 2.2.6 list alternatives considered and eliminated from detailed study as well as the reasons they are not carried forward for detailed analysis.Compensation for retention of the land would vary based on alternative and land retention estate(s) and method(s) selected and would be negotiated with the State after the NEPA/HEPA process; therefore, it is not possible to discuss potential compensation in the EIS.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		regards to potential adverse impacts associated with the alternatives.	Likewise, costs to investigate, remove, and cleanup hazardous substances and MEC and conduct various other lease compliance actions would depend on the alternative selected and negotiation with the State after the NEPA/HEPA process; therefore, it is not possible to discuss these potential costs in the EIS. Table 2-1 describes the training facilities and associated actions within the State-owned land, and Figure 2-1 illustrates the locations of those training facilities as well as the Training Area boundaries. Section 2.1.2 summarizes the types of training conducted in the State-owned land.
Anne Frederick	Hawaii Alliance for Progressive Action	On behalf of Hawai'i Alliance for Progressive action (HAPA), I am writing to express our strong opposition to Army retention of Pōhakuloa lands, and to any further military training, exercises, or presence in Pōhakuloa. As an organization that works to protect Hawai'i and her people, we are firmly opposed to the Army's retention of any of the "State" lands at Pōhakuloa. HAPA supports the "No Action Alternative" that would allow the lease to expire and require the Army to comply with all lease terms that include the clean-up of these lands. The other alternatives preserve a status quo in which Hawaiian land is bombed, burned, littered and polluted. The status quo is precisely what needs to be changed. Scores of concerned citizens have taken time to express concerns about the impact of the long-term occupation of these lands and the presence of the US military in our islands. This study should follow the parameters set by true experts on the impacts of your proposal. Our comments have raised the impacts of the occupation of these parcels, spanning time and space, and the EIS should follow suit.	Please see General Response 1.
Anne Frederick	Hawaii Alliance for Progressive Action	Please evaluate historical harms that would continue should the Army retain these lands.	Discussion of the impacts on communities with environmental justice concerns from the Army's historical and current presence and mission activities is provided in Section 3.11.6.
Anne Frederick	Hawaii Alliance for Progressive Action	This should also evaluate the growing cumulative impact that would compound should the Army continue misusing these lands.	Chapter 4, Cumulative Impacts, provides an analysis of the cumulative impacts of the Proposed Action and lease compliance actions with past, present, and reasonably foreseeable future actions for all resource areas.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
			Section 4.1 revised to state that past actions are actions from the beginning of military activity at PTA to the present time and are captured in the existing conditions analysis of each resource area.
Shelley Fritz		<p>Aloha, I witnessed the 2 public comment periods, and as someone who has lived in Hawai'i for nearly 2 years, and who has a family history of military service through many of the wars fought in the centuries since the founding of the United States, I implore you to listen to the vast majority of the people of Hawai'i and end your lease. There are many valid and important perspectives that have already stated why ending the lease is the right thing to do. I support these comments and agree with this perspective. The United States has disgraced itself by exercising military might with an unjustified approach that has poisoned the land, water, and air of Hawai'i and many other places. My ancestors, their lives, sacrifices, and the sacred words on which the founding of the United States is founded upon are not being honored by the lack of care and respect the military has shown Hawai'i and United States citizens. History will tell the truth about what has been happening and nothing will go unaccounted for. I urge you to hold yourselves accountable and do what is right, so that we may all live in a truly free and just world free from the violence and military imposed terrorism that war profiteering engender. Mahalo</p>	Please see General Response 1.
Ronald Fujiyoshi		<p>My name is Ronald S. Fujiyoshi. I live at [address redacted], Hilo, HI 96720. I am 84 years of age, old enough to be considered a "kupuna." Although I was born in Los Angeles, CA I came to Hawaii to live at the age of 1 1/2 years. My family moved to Hilo in 1957 when I was a junior in high school. I attended the University of Hawaii in Hilo for one year from 1958 to 1959. Thus, I have called Hilo my permanent home since 1957, about 67 years. I did serve the United Church of Christ as a missionary in Asia from 1968 through 1988, returning to Hilo in February of 1988. I have lived in Hilo continuously since that time, so I am very aware of the Pohakuloa Training Area (PTA) for a long time.</p> <p>I was the pastor of the Ola`a First Hawaiian Church from</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>1992 through 1999 and have been active in the Association of Hawaiian Evangelical Churches of the Hawaii Conference of the United Church of Christ. I am also the treasurer of Ohana Ho`opakele, a Hawaiian organization that the PTA lists as one of the Hawaiian organizations with advisory status to it. Over the years I have done as much research as possible concerning the PTA and have been on base a number of times.</p> <p>I am opposed to the PTA continuing its lease on Hawaii Island. My reasons for this are as follows:</p> <ol style="list-style-type: none"> <li>1. The expressed purpose of the PTA is to prepare US military for war. I am opposed to war as a Christian. The US has been involved in a continuous violent conflict at different places in the world which I oppose as well. The Hawaiian Kingdom as a nation was considered a "neutral" nation and took a stand to oppose involvement in any war.</li> </ol>	
Ronald Fujiyoshi		<ol style="list-style-type: none"> <li>3. The supposedly legal basis for the U.S. military to use the PTA area is questionable. President Bill Clinton signed Public Law 103-150 into law in 1993 which clearly admits that the Hawaiian Kingdom was illegally overthrown with the landing of U.S. military forces in January 1893. From a perspective of international law, if the 1893 overthrow was illegal, than any decree by a U.S. president or a Governor of the Territory of Hawaii to give the land to the U.S. military or to even lease the land would also be illegal. Thus, the basis upon which the U.S. military is using the PTA is questionable.</li> </ol>	Please see General Response 1.
Ronald Fujiyoshi		<ol style="list-style-type: none"> <li>4. The original designation of lands in Hawaii was done in 1848 under the Great Mahele. Some of the land that the PTA uses is admittedly land that was designated as "Crown Lands." Under an international understanding of land, when a foreign government takes over a country it cannot take possession of "private lands." Under the Mahele of 1848 the "Crown Lands" were the private lands of the King and therefore cannot be under the control of a government other than the Hawaiian Kingdom. For these reasons, I oppose the renewing of a lease of any land at the PTA to be used by the U.S. military. I am also opposed to a land swap for any other land on Hawaii Island. End the lease and withdraw from Hawai'i. Thus, of the alternatives</li> </ol>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>provided I am in favor of the "No Action Alternative." Thank you for allowing me to comment on the second draft of the EIS.</p>	
Ronald Fujiyoshi		<p>2. The firing of military weapons using live ammunition has destroyed much of the plant and animal life and left large areas that will not be able to grow anything for a long time. It probably has polluted the underground water that will have negative effects on people and animals drinking the water.</p>	<p>The best available scientific data for groundwater and surface water quality was incorporated into this EIS. Groundwater and surface water quality are discussed in Section 3.9 of the EIS. Section 3.9.4.6 of the EIS documents the existing management measures utilized by the Army to protect water resources. The State Department of Health (DOH) Safe Drinking Water Branch (SDWB) monitors groundwater quality of aquifers as described in EIS Section 3.9. SDWB has released groundwater contamination maps for Hawai'i Island that show most contamination is along the eastern coast of the island. The DOH SDWB Environmental Health Portal can be accessed at <a href="https://eha-cloud.doh.hawaii.gov/sdwb/#!/home">https://eha-cloud.doh.hawaii.gov/sdwb/#!/home</a></p> <p>Section 3.5 Hazardous Substances and Hazardous Wastes presents the existing conditions from current activities at PTA and notes that risk of contaminants mobilizing is not a concern as limited surface water and groundwater pathways on State-owned land pose minor potential impact to soil and groundwater quality.</p>
Ashley Galacgac	AF3IRM Hawai'i	<p>AF3IRM Hawai'i strongly opposes the Army's retention of any of the "State" lands at Pōhakuloa. AF3IRM is a transnational feminist organization with chapters across Turtle Island and America's occupied territories where Native, Black, and Immigrant women unite to fight against imperialism and colonization. We as transnational feminists understand that patriarchy is at the core of what enables these oppressive systems to continue to exist and are committed to dismantling them. We reject the crux of why the United States Army seeks to continue its occupation of Pōhakuloa. We support the "No Action Alternative," which will end the current lease on the 23,000 acres with no retention options. The U.S. military for far too long has used Hawai'i for its strategic importance to the United States war mongering.</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
Ashley Galacgac	AF3IRM Hawai'i	<p>According to the EIS, "In addition to the U.S. military commands and personnel stationed in Hawai'i, Hawai'i is geographically situated between the west coast of the continental United States and the countries in the USINDOPACOM AOR and serves as a logistical link with U.S. military installations across the Pacific region. Therefore, Hawai'i is a strategic location for national defense and rapid deployment of military forces." "National defense" is at the expense of desecrating and exploiting lands, waters, and people of Hawai'i. U.S. military presence has shown a pattern of land and resource misuse harming environmental ecosystems and indigenous lifeways in Hawai'i and across the globe. The U.S. has been complicit by funding and providing weapons to the Israeli Occupation Forces even when American citizens have demonstrated their dissent to the death and destruction of Israel's crimes against humanity. Many of these weapons have been developed and tested in Hawai'i! Hewa! Like Israel's colonial project in Palestine and other occupied lands, the U.S. is exploiting lands, poisoning waters, desecrating sacred places, and erasing Kanaka Maoli here in Hawai'i. ENOUGH IS ENOUGH.</p>	Please see General Response 1.
Ashley Galacgac	AF3IRM Hawai'i	<p>One of the resource areas included is human health and safety. Wherever soldiers are being trained to kill or develop weapons for destruction, there will never be health and safety. As transnational feminists, we are attentive to intersections among nationhood, race, gender, sexuality, and economic exploitation on a world scale in the context of imperialist globalization. The same tools of imperialism, white supremacy, and patriarchy are the root cause of the ongoing crisis of missing murdered indigenous women and girls. It is the root cause of the dispossession of Native peoples. It is women who bear the brunt of the violent consequences that come with the dispossession of land from indigenous people. The extent of the environmental impacts of Pōhakuloa by the U.S. military is not reflective of the damage over the years and even years to come. Hire a third party consultant to evaluate the environmental impacts on all 132,000 acres that they occupy at Pōhakuloa. What is more important is</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
Ashley Galacgac	AF3IRM Hawai'i	<p>the action taken afterwards to do what is right and restore the health of the land and return it to the people.</p> <p>The people of Hawai'i say NO MORE WAR and LAND BACK, BODIES BACK. Invest in taking care of the people with food sovereignty, fully resourced schools, accessible healthcare, and housing. Community care will bring safety. We demand that the U.S. military implement an immediate ceasefire on all conservation lands in PTA and that they not be allowed to change zone classifications. No more live fire training in Hawai'i to prepare soldiers to wage wars overseas. This "readiness" for war will only lead to more violence. Return back the lands to the people who will steward the life-giving lands and endemic species and restore the sacred connection to the place.</p>	Please see General Response 1.
Ashley Galacgac	AF3IRM Hawai'i	<p>We demand the U.S. military implement an immediate clean-up and restoration effort with the millions of dollars that they are annually allotted. Only then can the people of Hawai'i be healthy and safe. We envision, and are actively creating, a world where indigenous peoples lead in 'āina stewardship and waters flow. Women and gender expansive relatives reclaim their respected role as knowledge keepers, healers, and givers of life. Everyone is cared for and every BODY is safe. In conclusion, end the Army's retention of any of the "State" lands at Pōhakuloa, clean up and restore the lands, and immediately return the land to Kānaka Maoli.</p>	Please see General Response 1.
Keao Garmon		<p>Aloha nui kakou. Pākahi a pau. O wau no ho'i o Keao Garmon, mo'opuna kuakahi o Edith Kanaka'ole, mo'opuna o Pearl Ulunuiokamāmalu Kanaka'ole Garmon. I repeat my lineage to you guys. Sorry, let me repeat that in English for those of you who don't understand the Hawaiian language. Aloha. My name is Keao Garmon. I'm 15 years old. I attend Ka'Umeke Kā'eo Public Charter School and I come here to oppose of what's going on in Pohakuloa right now. I repeat my lineage to you guys because my great-grandmother, Edith Kanaka'ole, did not fight not only for our language to be taught in school, but she taught everybody that the aloha for our 'āina should always come first. And that is passed on from generation into generation in my family. She's three generations</p>	Please see General Response 1.

Responses to Second Draft EIS Comments

Commenter	Submitted By	Comment	Response
		<p>above me. So now that I know that, so let me repeat my lineage on my father's side. I am grandson to Colonel Thomas Joseph Killian (phonetic); I am son of airmen of 20 years, Christopher Paul Killian. So now this is -- this -- this makes a little bit of conflict, right? You can see right here I'm shaking. So I come up here and when -- when both of you Mr. -- Mr. Colonels was speaking, I -- I heard, and I'm - - I'm going to just say this, I heard two things that was complete BS. Number one is that you guys are -- I -- I forget what I was going to say, you know. (speaking in Hawaiian), you know, I -- I stay coming up here for -- for giving my mana'o from my -- from my na'au and from my pu'uwai. So the first thing you guys said was that you guys care for the land. I'm going to tell you guys right now, you guys don't, because if you guys really cared for the land, you guys wouldn't do that. What you guys doing up there, you guys stay training, you guys stay firing guns, doing missiles, and I don't know what's going on up there. I don't know how long it's been going on up there. Probably since before I was even born. Guarantee since before I was even born. But I know it's been far too long because the moment you guys started training up there, you guys been doing it for far too long. Now the second thing is, you, Mr. Colonel McGunegle, said that there's no other place that you guys could be doing this. I've been to the mainland twice. Actually, no, I'm not even going to say it's the mainland because this is our mainland. This is our mainland right here. That is the continent, Ua lawa mākou i ka pohaku; i ka'ai kamaha'o o ka 'āina. We don't need these ships. We can survive off the land.</p>	
Keao Garmon		<p>So, anyway, my point is, I've flown to the continent twice and what have I seen going over all these ridges and mountains? Nothing but open land, nothing but open land for hundreds of acres and miles. So why you guys got to do more here? Why you guys got to train your military over here? And, honestly, all of this would never be happening if back in 1893 you guys never invaded our homeland. Aloha, mahalo nui no ka ho'olohe ana mai, mahalo.</p>	<p>Section 1.2 provides information on the strategic importance of Hawai'i for national defense and PTA's role. Section 1.3 describes the purpose and need of the Proposed Action (retention of State-owned land at PTA).</p>

Responses to Second Draft EIS Comments

Commenter	Submitted By	Comment	Response
Kamamalu Garmon		<p>My name is Kamamalu and I belong to the Kanaka'ole family. I will also repeat my lineage to you. My great-grandmother is Edith Kanaka'ole and my great-grandfather is Luca Kanaka'ole. I'm granddaughter to Colonel Thomas Joseph Killian and I am daughter to Christopher Paul Killian, who served in the Air Force for 20 years. My mother is Native Hawaiian and my father is Haole. I'm 15 years old and I'm a freshman at Ka 'Umeke Ka'e'o. My father worked at Pohakuloa for a while before realizing that he did not want his keiki to be choosing between our culture and his paycheck. We k�naka have asked nicely for you to leave and go somewhere else, but I'm pretty sure I can speak for most k�naka when I say that we are pau asking nicely. Understanding the need -- I understand the need for your training, trust I do. I'm a granddaughter and a daughter to multiple people who served in the military, multiple branches, but you do not need to do that here. You really don't. I am not sorry to say that I do not care about what moderations you prefer to do on land that doesn't belong to you in the first place, that you continue to trash like we can just get a new Pohakuloa. I will -- you claim, time and time again, that it is to help and to support our people but you have proved that that is not that. But beautiful Hawaii, yeah? Beautiful Hawaii. "So beautiful. I love working here. Let's bomb it, huh? Yeah, let's bomb it." 'A'ole. So shame. You are working near our elder mauna, which is also our water source. Was what Hui Ololoa doing on Kaho'olawe not enough for you to know that we k�naka do not support you wrecking our �aina? We have not grieved Kaho'olawe, and I refuse to have to grieve another part of our �aina, Pohakuloa. I fear by the time I have my kids, they'll have to do projects on how we used to have Pohakuloa like how we now do projects on how we used to have Kaho'olawe as a whole. And I refuse to have that happen. If we do not fight now, who will? I n� �a'ole na k�kou, na wai? My whole life, which has not been very long, so take of that what you will, Mr. Military Man, I have been fighting for what's right for my people and my country. I hope by standing here tonight will teach my -- will teach keiki my</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>age, younger or older, that they have a voice and their leo matters because I and many refuse to sit here in silence. I do not care if you do not have the power to change this. When you leave here, pick up your rubbish. Seriously, this is what we have been taught since keiki days, when you make a mess, especially one that you should not be making, clean it up. You go and tell your Mr. Boss Man to get off our 'āina. And unless you can show me a treaty, stop calling us a state and leave us alone. I will stand with my culture and my 'āina 'till the day I die. Mahalo for your time. Thank you.</p>	
<p>JackLyn Garnick</p>		<p>So is this “The use of military munitions potentially leaves behind MC that may represent a potential threat to soil and groundwater quality. Lead is the primary COC from small-caliber munitions, while copper, antimony, zinc, and tungsten are other contaminants commonly associated with small-caliber munitions. The high explosives used in medium and large-caliber munitions may result in the release of compounds such as cyclotrimethylenetrinitramine, cyclotetramethylenetetranitramine, and trinitrotoluene, and the propellants for these munitions may release 2,4-dinitrotoluene, 2,6-dinitrotoluene, and nitroglycerin. Perchlorate compounds are commonly released from the use of pyrotechnics, and white phosphorus is commonly released from many obscurants. Pentaerythritoltetranitrate is a component of detonation cords and is possible on ranges where demolition training has been conducted. Soil sampling has not been performed on all the TAs, FPs, and ranges to determine the presence or absence of MCs.” Then we come to the depleted uranium issue. The deeper I looked into the what has/is going on up at Pohakuloa, the more alarmed I become. I feel the seriousness of this has been downplayed. I didn’t see any creative ideas on how to restore the area, only who wouldn’t take the blame. And then the fugitive dust is feathered in., Did I miss something</p>	<p>Sections 3.5.4.11 and 3.5.4.12 describe the lack of mobilization of munitions constituents, including depleted uranium, within soil, groundwater, and surface water. The text notes that risk of contaminants mobilizing is not a concern as limited surface water and groundwater pathways on the State-owned land pose minor potential impact to soil and groundwater quality.</p> <p>The best available scientific data for groundwater and surface water quality was incorporated into this EIS. Section 3.9.4.6 documents the existing management measures used by the Army to protect water resources. The State Department of Health (DOH) Safe Drinking Water Branch (SDWB) monitors groundwater quality of aquifers as described in Section 3.9. The DOH SDWB has released groundwater contamination maps for Hawai’i Island that show most contamination is along the eastern coast of the island. The DOH SDWB Environmental Health Portal is available at <a href="https://eha-cloud.doh.hawaii.gov/sdwb/#!/home">https://eha-cloud.doh.hawaii.gov/sdwb/#!/home</a>.</p> <p>Sections 3.5.4.12 and 3.6.4 contain a discussion on depleted uranium and the Army's 2009 air quality monitoring program, which concluded that depleted uranium had not impacted air quality at PTA or in the surrounding area.</p> <p>The current status of range management activities regarding hazardous substances and hazardous wastes is</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
			discussed in Section 3.5.4. Section 3.5.6 describes the cleanup activities to be performed on any State-owned land not retained.
JackLyn Garnick		<p>I appreciate all of the work put in to compile and coordinate this information in order to meet the regulations set out for NEPA and HEPA. There is a wealth of information here, so much so that it is overwhelming. Thank you for the opportunity to comment and ask for additional clarification. Respectfully requesting DLNR choose the responsible alternative of the NO Action Alternative where the Army would not retain any State-owned land at PTA after the lease expires I am grateful that through the comments from agencies and the public, regarding the Draft EIS published in April 2022, it was recognized that there are some blaring issues here that still need to be responded to appropriately. I appreciate that many of the concerns were addressed in the second draft of the EIS though I wonder how much of it is just lip service? At the public meetings held in May 2024, the Hawai'i Garrison Commander talked about the responsibility of being "good neighbors and stewards of the land that they train on." It felt like a harsh slap across the face when looking at and experiencing the way the military has handled its responsibility here on this beautiful and amazing island.</p>	Please see General Response 1.
JackLyn Garnick		<p>I do not understand why the lease, signed August 17, 1964, was not delayed six weeks, until the enactment of HRS Chapter 183C went into effect October 1, 1964. Government work, no matter what level it may be, does not happen quickly. The Army and DLNR had to have known this change was coming. Why not wait six weeks rather than allow a nonconforming use? Who or what was the Army and DLNR looking out for, not the people or land of Hawai'i. Where is the Malama 'Aina? I don't know that you can answer my questions, but it makes no sense to me, which makes it almost suspicious. Was the Army, already at that time, covering over the UXOs and the disrespect they were showing as they littered and polluted our island? Section 14 of the 1964 lease agreement states "In</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>recognition of the limited amount of land available for public use, of the importance of forest reserves and watersheds in Hawaii, and of the necessity for preventing or controlling erosion, the Government hereby agrees that, commensurate with training activities, it will take reasonable action during its use of the premises herein demised to prevent unnecessary damage to or destruction of vegetation, wildlife and forest cover, geological features and related natural resources.” Anyone can write anything they want. Where are the forms, dated, signed off on, pictures included? The Government has not held up its end of the bargain, yes a 65-year lease for \$1, yes one dollar, is a bargain! The County of Hawai’i passed Resolution 639-08 asking for testing and monitoring of the area due to the depleted uranium used in live fire training with the Davy Crockett equipment. This Resolution was totally disregarded from what I can tell. It took a lawsuit with a Court-Ordered Management Plan to get the attention of the Army. I could not find where even that has been followed as ordered other than in words and acronyms. COMP. The first two letters being Court Ordered. Where is the documentation of compliance?</p>	
JackLyn Garnick		<p>The Mission statement states “environmental and cultural stewardship in support of the USARPAC training strategy while maintaining an enduring partnership with the Hawai’i Island community.” Not keeping their end the lease agreement is not enduring. It’s hard to believe that with the history of the Army’s actions, they would have the audacity to ask for an extension to the lease. DLNR has the responsibility to do what is necessary to encourage the Army to start clean up now in preparation to vacate at the end of the lease. The EIS talks about it, but I don’t see it clearly documented.</p>	Please see General Response 1.
JackLyn Garnick		<p>If the Army was a good neighbor as they claim, they would be working in partnership now to mitigate any “new short-term, moderate, adverse impacts on historic and cultural resources during the transition period for CRM programs from Army to State management,” rather than waiting till the end of the lease and abandoning their mess. I feel like I keep saying the same thing in a different way. This is so</p>	As noted in Section 3.4.6, the Army does not have any proposed mitigation measures for less than significant impacts to historic and cultural resources.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>complex and far-reaching but I am sure there are a lot of good people involved that also want to see the right thing done, the one that protects this amazing and alive island many of us call home.</p>	
JackLyn Garnick		<p>Throughout the EIS when describing the Alternatives, under “Potential Mitigation Measures,” it’s almost like you have a rubber stamp that says it “does not include proposed Army actions,” My question to you is did I miss a section where you talk about what the Army will do to mitigate the issues they have created and intend to leave behind?</p>	<p>Mitigation measures are discussed in the alternatives analysis in each resource subsection in Chapter 3. Because the No Action Alternative does not include proposed Army actions (i.e. Army ongoing activities would end), the No Action Alternative does not include mitigation measures. The Army would follow lease compliance actions in accordance with the lease and as negotiated with the State for land not retained.</p>
JackLyn Garnick		<p>I am concerned about the health of our people, which is a reflection of the health of our island. It is all connected. What happens Mauka happens Makai. I am concerned for our air, water and land and though the EIS is choke full of information, Malama ‘Aina has not been demonstrated consistently. Reading about soils and water, it felt like lack of concern about contaminants being mixed into the water as it is an arid location. Then it talked about climate change in another section with concern for the extremes of dry causing wildfires and flooding during Kona lows. Just this past spring we watched the flooding effects of a Kona low where flooding cut a wide swath from Mauka to Makai in the Kawaihae area.</p>	<p>Please see General Response 1.</p>
JackLyn Garnick		<p>When reading through the EIS it didn’t feel like the cultural resources were of much importance and it kept referring to the CIA. I would like to commend the folks who worked on this document. I wish I had read it early in this process and skipped over some of the other things that I have spent days reading. This tome has been amazing to spend time with. I will not claim having read it all but for what I have been able to get through, thank you for the education. Regarding the cultural resources and traditions, I knew they considered the mountains Sacred. Now I understand to a greater level of love, admiration and respect. Because of that I say with even more passion, it is time for the Army to vacate this island - after cleaning up its mess. Start the cleanup NOW. It should have been an ongoing process as agreed by the Army in 1964 when it</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		signed the lease. Time and time again the Army has been asked, then told via court order to clean it up!! Please demonstrate in the EIS how DLNR is attempting to hold the Army to their agreement.	
JackLyn Garnick		Another thing that has opened my eyes through this process is reading former military personnel and civil contractors stating that the Army doesn't really need this land for this purpose. One of the commenters said Colorado has space for you. Has the Army considered this? The local kahuna perspective has helped me understand how the Army brings the energy of war to these islands. Many of us are peaceful people, heart-centered earth loving sharing Aloha with our Ohana as we Malama the 'Aina. Killing innocent people and children is what we see in your kind of wars. I have always felt that war is not the answer. I chose Alaha. I pray you will clean up your mess and go away. Decommission Pohakuloa Training Area.	Please see General Response 1.
JackLyn Garnick		Do you, the contractors for G70, feel that is appropriate, that the Army just skate off "Scott free"? I can NOT understand how DLNR can continue to support and endorse bad behavior and harm to our islands, our future health, our Keiki's health, and their Keiki's health when they are the one department in the state tasked with protecting the 'aina. Am I to understand that DLNR is going to take full legal and financial responsibility for the privilege of allowing the Army to trash the Pohakuloa area? I am sorry if you don't like the way I worded that. I am tired of reading how the Army doesn't care, nor does it seem like DLNR does either. And no one is taking full responsibility for what has been created up there. Shame on all, do they not know what pono means?	Please see General Response 1.
JackLyn Garnick		Two last things. First off, for whom ever contracted with G70 to work on this EIS, please explain to them the importance of the Bill of Rights, the First Amendment and freedom of speech and peaceful assembly. Please include it in the HR packet for future contractors as well. A group of peaceful protectors at the Hilo meeting in May were told to leave by Jeff Overton. He said they could not be there with their signs. The other thing is for the webmaster for the project homepage. Why list only one	Please see General Response 1.

**Responses to Second Draft EIS Comments**

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		<p>public meeting video listed? Some people may not have realized that the video of the Waimea public meeting was also on video and available. Open transparency is a good thing. Thank you for the opportunity to learn and ask questions in the quest to understand and find solutions. As a wise man recently said, we are all in this canoe together. Respectfully submitted with support for the No Action Alternative JackLyn Garnick</p>	
JackLyn Garnick		<p>Pohakuloa Training Area is in a conservation district “established to conserve, protect, and preserve important natural resources and historic and cultural resources of the State through appropriate management and use to promote their long-term sustainability and public health, safety, and welfare.” Conservation districts are intended for uses such as park land, lands for growing and harvesting commercial forest products, and outdoor recreation. Military use is not included as an allowable use for any conservation district subzone. It is only legal because of the six-week jump on the preservation and protection ruling, which puts the Army’s use in a grey zone. Legal but nonconforming. It’s time they return the land, in as pristine of condition as possible. Is there anyone monitoring them from DLNR, or any other state agency?</p>	<p>Compliance with HAR Chapter 13-5, Conservation District, has been revised and is discussed in Sections 1.4.2 and 5.3.2. Sections 1.4.2, 3.2, and 5.3.2 have also been revised to make clear that for analysis purposes, the EIS assumes BLNR would establish a special subzone in the conservation district through a rule amendment that allows for military training use.</p> <p>Such a special subzone would be novel and represents a departure from current Conservation District uses.</p> <p>Section 3.2.4.1 discusses the Court Ordered Management Plan which requires periodic monitoring and inspection of the State-owned land at PTA by the State.</p>
JackLyn Garnick		<p>If the Army was truly a good neighbor they would not have had to be sued in court in order to do the monitoring and cleanup they agreed to in the lease agreement of 1964. Thank. You for including those documents in the EIS for easy access. As the Environment Caucus of the Democratic Party of Hawaii commented “The U.S. Military has historically and systematically abused and degraded the environment and has not been environmentally sound in its cleanup and restoration.” With a history of neglecting responsibilities to the lands the Army’s actions have used, have safeguards been discussed and enforced or at least documented?</p>	<p>As can be seen in Appendix G, the State (not the Army) was the defendant in the court case. Sections 3.2.4 and 3.5.4 state that the Department of Land and Natural Resources has implemented the Court Ordered Management Plan and site visits are occurring. The Army has received no corrective action requirements from the site visits. Section 3.5.4.14 summarizes existing management measures with respect to hazardous substances and hazardous wastes. Appendix E provides further details on these management measures. As noted in Section 1.5.2, State decisions following acceptance of the EIS may include the land retention estates and methods as well as associated terms (e.g., lease conditions) in any new real estate agreement. Sections 3.5.6.1, 3.5.6.2, and 3.5.6.3 note that for all State-owned land retained by lease it is assumed that DLNR would</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
			continue to implement the COMP or develop and implement a revised lease compliance monitoring plan to confirm lease compliance, particularly with respect to military munitions and MEC.
JackLyn Garnick		I see over the years testing was done for a year here another monitoring effort done 210 times from different locations. Where is the map that would show these?	A map showing the three locations for airborne uranium sampling can be found on Figure 1 in the Airborne Uranium Monitoring U.S. Army Pohakuloa Training Area, Island of Hawaii, Summary Report - March 2010, which is available online at: <a href="https://home.army.mil/hawaii/application/files/5815/5961/1869/mar10.pdf">https://home.army.mil/hawaii/application/files/5815/5961/1869/mar10.pdf</a> .
JackLyn Garnick		How many pollutants from PTA ran downhill, into the streams and on in to the ocean? What kind of testing is done? When there are brown water advisories after a storm like that, is any special testing done?	<p>The best available scientific data for groundwater and surface water quality was incorporated into this EIS. Groundwater and surface water quality are discussed in Section 3.9 of the EIS. Section 3.9.4.6 of the EIS documents the existing management measures utilized by the Army to protect water resources. The State Department of Health (DOH) Safe Drinking Water Branch (SDWB) monitors groundwater quality of aquifers as described in EIS Section 3.9. SDWB has released groundwater contamination maps for Hawai'i Island that show most contamination is along the eastern coast of the island. The DOH SDWB Environmental Health Portal can be accessed at <a href="https://eha-cloud.doh.hawaii.gov/sdwb/#!/home">https://eha-cloud.doh.hawaii.gov/sdwb/#!/home</a></p> <p>Section 3.9.4.2 has been updated to include additional information from the Thomas (2019) report. A link to this report has been added to the PTA EIS website (<a href="https://home.army.mil/hawaii/ptaeis/project-home">https://home.army.mil/hawaii/ptaeis/project-home</a>) under the "Documents" tab.</p> <p>The Army does not perform any testing relating to brown water advisories.</p>
JackLyn Garnick		Fugitive dust from DU, it appears, has triggered monitoring and testing which the Army is unable to avoid or push aside. The more I have read in this EIS, the more disgusted and educated I have become. So my question is, where are the results of these tests posted where the public can access them anytime, not just as part of an EIS	See Sections 3.5.4.12 and 3.6.4 for a discussion on depleted uranium and the Army's 2009 air quality monitoring program, which concluded depleted uranium had not impacted air quality at PTA or in the surrounding area.

**Responses to Second Draft EIS Comments**

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		<p>although I can't seem to find them here in this tome either. Where are they? Why is Appendix III included but not completed "Semi-Annual Inspection Report". Where are the test and monitoring results that are mentioned in this EIS? Where is the transparency that being a good neighbor would reflect? You talk about the COMP but where are the results/reports? DLNR? NHLC? Why are these not included here in the EIS?</p>	<p>Appendix III of the Court-Ordered Management Plan is an example provided by the court, not an Army-developed inspection report.</p> <p>Links to unclassified, available documents, including the DLNR Court-Ordered Management Plan inspection reports, have been added to Chapter 6 of the EIS as well as the PTA EIS website (<a href="https://home.army.mil/hawaii/ptaeis/project-home">https://home.army.mil/hawaii/ptaeis/project-home</a>) under the "Documents" tab.</p> <p>The Army Freedom of Information Act (FOIA) Library and FOIA Request process are available at: <a href="https://www.rmda.army.mil/foia/RMDA-FOIA-Division.html">https://www.rmda.army.mil/foia/RMDA-FOIA-Division.html</a>.</p>
JackLyn Garnick		<p>The environmental conditions at PTA (landscape in general) have been continually degrading for a variety of reasons from what I can tell. The EIS states "Range Operations personnel oversee the cleanup of ranges when the soldiers have completed their training. Military personnel endeavor to remove or deactivate all live and blank ammunition upon completion of a training exercise and prior to entry by the public in compliance with the lease and Pohakuloa Training Area Range Operations Standard Operating Procedures." However, in this same EIS is testimony from eyewitnesses that this is not true. Bullets, gun components and other litter has been found. Limited cultural access will continue to be constrained for the rest of time in the project area do to unexploded ordinances and spent casings that make it unsafe for personnel or locals to be there. That is alarming. Where is the budget for the clean-up? For the monies spent, what was done?</p>	<p>Section 3.5.2 revised to add the definition of operational ranges. Section 3.5.2 describes the Defense Environmental Restoration Program. Section 3.5.4 describes past range management activities within the State-owned land. Section 3.5.4.11 revised to indicate military munitions have been used at PTA prior to the current lease and as far back as World War II. The use of these military munitions prior to the current lease's range management requirements may have left behind MEC. Because the State-owned land is still an operational range, a full assessment of MEC that may be present has not been conducted. Section 3.5.6 revised to indicate the State-owned land retained would remain an operational range for the foreseeable future, deferring site restoration under the Military Munitions Response Program until after range closure. Text has been added to note the State-owned land not retained would no longer be an operational range after the lease expires and the land would be removed from the Army's inventory of operational ranges. At that time, the Army would conduct site restoration in accordance with the Military Munitions Response Program, CERCLA, and the terms of the lease. Following completion of lease compliance actions and cleanup and restoration activities, the Army would remain responsible for</p>

Responses to Second Draft EIS Comments

Commenter	Submitted By	Comment	Response
			disposing of any MEC that is incidentally found on the State-owned land not retained due to the DoD's live-fire military training at PTA. Section 3.4 discusses existing cultural resources access and mitigation measures.
Kiaka Gaughen		<p>Aloha. My name is Kiaka Gaughen. I'm here representing my family, my kupuna, from past and my future -- my kids and my grandkids in the -- in the future. When I was a little kid, I was raised up in Waimea. I remember playing in the Waimea playground, jumping on the fence, watching the military drive up, and so excited about seeing all that, you know. It's like all right -- all right. And then as I grew up, I saw all of the -- the negative impact of colonization or overthrow on Hawaiians -- us Kānaka Maoli. I went to University of Hawaii, got a bachelor's in geography, worked with Haunani-Kay Trask. And we just kind of, you know, learned a lot about what's happening to us and the impact of the occupation, the overthrow, all of this stuff on Hawaiians. And then my -- you know I have a lot of family that was in the military and so I understand the training and all that, but I've got another awareness as I slow down and understand my intuition inside me or -- understanding that the future is so important for us to take care of the land. My bachelor's in geography was really important. I learned about the land, how it all works and all that and -- and then I got my master's in counseling because I wanted to help my kānaka because we have so much trauma going on. We load the prisons. We load every statistic out there and it's all related to the land. And as I live here, and I hear things going off up there -- and I hunt up there and I see things just getting destroyed. I mean giant things just blowing up and noise just shaking everything and -- and I see the devastation of our piko. And I think about my grandparents from Kawaihae to Ho'okena growing up without that and seeing the piko healed at that time, but now the piko is just getting all buss' and blown, cracked -- just destroyed. And it's looking worse for our kānaka because the land is just getting tortured. And as a native Hawaiian waiting on the Department of Hawaiian Home Lands list, seeing land that I can access even near that area or land getting swapped</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

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		<p>or ideas or of swapping or changing or selling -- and I'm still on the list and I can never get land until maybe 100 years from now, which is when I'm going to be passed. I hope the government and everybody understands the reality of Hawaiians waiting on lists, Hawaiians in prisons, suicide -- all of this connects to the land and the impact of that destruction that's happening up there. Because when we drive past it all of the time, we feel the mana from that and we feel the vibes, the -- the rhythms and the -- all this stuff that is just negative towards our families. I just want to just say that I really am against all of this and I hope that there's better judgement on making sure our people are put first, and the locals and the population on this island are put first -- on making sure our water and everything in here is all safe. Thank you so much.</p>	
Makana gerona		<p>STOP BOMBING and desecrating our land. It's hurting the land and the people.</p>	<p>Please see General Response 1.</p>
Scott Gifford		<p>I have participated in and witnessed military training exercises on PTA that have had disastrous effects on the local environment. These environmental impacts are not contained to the training area, but also affect the neighboring Hawai'i Island community. I was at PTA in summer 2022 when a wildfire started as a result of Army munitions training at PTA. The fire, which filled the air with impenetrable smoke for miles around, also spread to neighboring Waikoloa and resulted in public road closures. With such inadequate state wildfire infrastructure, as evidenced by Lahaina, the local community does not need the host of environmental impacts posed by PTA. Therefore, I submit my testimony in support of proceeding with a No Action Alternative. Please also conduct a third party consultation to evaluate the environmental impacts on PTA and remediate and restore the land.</p>	<p>As discussed in Section 3.16 and per the Memorandum of Agreement between the Army and the Hawai'i County Fire Department, signed December 22, 2014, the Army assists the Hawai'i County Fire Department with wildland fire suppression when requested. The Hawai'i County Fire Department, along with the National Park Service and DLNR Division of Forestry and Wildlife, are available to assist PTA firefighters to suppress fires that have the potential to become large. In accordance with DoD Instruction 6055.06, DoD Fire and Emergency Services Program, and the PTA Integrated Wildland Fire Management Plan, PTA personnel implement procedures for prevention and suppression of wildland fires. PTA employs full time staff to monitor and respond to all fires at PTA. Mitigation measures the Army proposes include (1) negotiation of an agreement with the State to monitor wildfires on land not retained and (2) implementation of additional thermal technology. These mitigation measures have been added to the Mitigation Measures subsection.</p>
Caleb Glass		<p>Thank you for reading my words and trying to understand my thoughts. I am personally against the renewal of this lease. I do not say this out of anger or hatred, nations have</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

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		<p>had militaries since the dawn of civilization, and although I do believe another way is possible, I also understand that such changes are not within the preview or power of this decision. If this lease is denied, the armed forces will seek another somewhere else. I am against this lease renewal because it: is environmentally damaging to an island ecosystem unique in the world, restricts American citizen access to efforts in reforestation and ecological management of the effected area, restricts access of indigenous peoples of Hawai'i to culturally sensitive sites.</p>	
Renee Godoy		<p>Aloha! I am writing in support of Pohakuloa Training Area of remaining where it is currently located on the island of Hawaii.</p> <p>As a private citizen I believe that it is crucial that we have a military presence and a place for our military personnel to train to ensure the safety of Hawaii and the Pacific area.</p> <p>As a Chaplain to first responders, I see how much PTA assists in emergency operations providing much needed assistance to our other county agencies such as our Police, Fire and Civil Defense. The location of PTA ensures quicker response time to nearby areas such as Mauna Kea Park.</p> <p>For these reasons, I recommend continued leasing of the lands there and cooperation with our County agencies in time of emergency.</p>	Please see General Response 1.
Mike Golojuch		<p>The training area is necessary to ensure our forces are ready to take on any threat in the Pacific.</p> <p>The EIS is more than adequate.</p>	Please see General Response 1.
Mark Gordon		<p>May 6, 2024 Thank you very much for the opportunity to comment on the second Draft EIS for PTA. I support either Alternative 1 or 2. I wanted to share comments on how continuing the land lease is beneficial to both the State as well as the Military. Benefits for the State: Training at PTA allows the Military to be prepared for national defense, especially for the Pacific Region. Being in Hawai'i allows for rapid deployment to areas. The Military is the largest</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

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		<p>employer in the State. Estimates are 80K employees in the State and 2K on Hawai'i Island. The most recent annual spending by DoD for the State is \$7.5B, an incredibly significant source of revenue. It is exceptionally good to have the Military as another industry for the State rather than primarily tourism. Besides military training at PTA, so also does Homeland Security, HPD, Civil Defense, and HFD. Through a joint aid agreement, PTA continues to offer support and equipment to the State. Most recently, during the Waikoloa Fire, PTA was able to request resources from O'ahu to help with the fire. PTA has the ability to request support not only from the Army but also from the other Military Branches. PTA continues to support HFD, as well as offering support and assistance to those on Mauna Kea and other nearby areas. PTA protects endangered species, animals, birds, as well as cultural/historical areas. Benefits for PTA/Military: Hawai'i is strategic for national defense and rapid deployment. PTA supports these objectives. PTA is the only major army training area in the Pacific Region. No other training area can accommodate live fire training for a large number of soldiers. Schofield, O'ahu has limited training and limited area to train. It is the only training area where units can use weapons systems at maximum capabilities and complete their training without leaving the State. PTA can simulate real-life war scenarios, including the varied environments at the Base.</p>	
Tiffany Graumann		<p>Give the land back to the people who will take care of it rather than destroy it. Demilitarize Hawaii now!</p>	<p>Please see General Response 1.</p>
Momi Greene		<p>FACTUAL HISTORY : ROBERT JOE ALBERT-CPLARMY / BURIED VETERAN'S CEMETERY / KONA HAWAII. Robert Joe Albert was my Birth Father Married my Hawaiian Mother after they met while he was Stationed in the ARMY @ SCHOFIELD Under COL KUPAU in 1946. He was also at POHAKULOA. He Often Spoke to Us His Children about SCHOFIELD - RED HILL - GREEN VALLEY - and POHAKULOA As He Worked at All of These. He Met my Mother while he was In Charge at GREEN VALLEY-PUNALU'U Where She Was Raised, as Her Mother Also. These Places Where The MILITARY CONTROLLED He Told Us Growing Up were ALLBOMBED &amp; THEREFORE WE MAY "NEVER GOTO</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

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		<p>BECAUSE THEY WERE ' POISONED ' and Therefore 'VERY DANGEROUS'.He Later Let Us Go To 'GREEN VALLEY' My Grandmother's FAMILY'S LANDS, Because He Said He Was IN CHARGE When he was Still in the ARMY &amp; His JOB Was To Clean Up THIS PRACTICE AREA Of 'GREEN VALLEY'. But We were Told DO NOT EVER GO TO RED HILL Or POHAKULOA AS WE COULD DIE.Sincerely,Patricia Louise Leimomi Albert Greene:Daughter of Robert Joe Albert/ Born 12-18-1927Died August 5, 2021</p>	
Regina Gregory		<p>1. Significant adverse impacts mean "no action" should be the preferred alternative. 2. I hope you will be compensating DHHL for past use and future uselessness of their land.</p>	Please see General Response 1.
Monisha Das Gupta		<p>In summary, the Army has not proven to be good stewards of the land, and the three-volume statement evidences that. The return of the 22,750 acres the Army uses to the state is the only way to ensure that Hawai'i's land and water resources, endangered species' habitats, and communities that inhabit the land are protected and restored to health. Mahalo for your attention. Monisha Das Gupta Honolulu, 96815</p>	Please see General Response 1.
Monisha Das Gupta		<p>Numerous metals and chemicals are listed in 3.5.4.3, such as lead, copper, and antimony. The report also indicated that future cleanup efforts may include "emerging contaminants" that are as yet unknown. The EIS fails to lay out a sound plan for cleaning up the State-leased lands. The report's approach to cleanup and reforestation is inconsistent.</p>	<p>The current status of range management activities regarding hazardous substances and hazardous wastes is discussed in Section 3.5.4. Section 2.1 states that after expiration of the current lease, the Army would follow federal law and regulations to determine how and when cleanup and restoration activities for hazardous substances and MEC within the State-owned land not retained would occur under the CERCLA process.Section 3.5.6 revised to clarify that following completion of lease compliance actions and cleanup and restoration activities, the Army would remain responsible for disposing of any MEC that is incidentally found on the State-owned land not retained due to the DoD's live-fire military training at PTA.As noted in Section 3.2.4.1 of the EIS, reforestation is a lease condition. The EIS discusses potential impacts associated with completion of lease compliance actions as well as cleanup and restoration activities for any State-owned land not retained. Completion of the lease compliance actions is dependent</p>

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
			upon technical and economic capabilities (as noted in the lease), Army regulations, and negotiation with the State.
Monisha Das Gupta		The airborne contaminants are extremely detrimental to the community adjacent to and downwind of PTA. On windy days, dirt is kicked up and carried miles from its source point, leading to poor air quality and unhealthy conditions.	Comment noted. Section 3.6.6 analyzes the air quality impacts from fugitive dust emissions.
Monisha Das Gupta		The Pōhakuloa region is a vital watershed. The draft EIS recognizes that the Pōhakuloa region is a vital watershed and “the uniqueness [of this groundwater] is ‘irreplaceable’; and the vulnerability to contamination is classified as ‘High.’” Given the potential pollutants listed in section 3.5, these and other pollutants could infiltrate the aquifer. While the groundwater at Pōhakuloa is not directly consumed, it must be noted that all water within our porous, volcanic island is interconnected, eventually reaching water sources that are consumed as well as the water flowing out to the sea. Lead is a particular concern, as no amount of lead is safe for biological consumption. As stated in section 3.5, “Lead is the primary COC from small caliber munitions.” The draft EIS further states that the use of military munitions pose a potential threat to soil and groundwater quality. While the draft EIS states that soldiers are required to collect spent casings, bullet casings litter the landscape.	<p>The best available scientific data for groundwater and surface water quality was incorporated into this EIS. Groundwater and surface water quality are discussed in Section 3.9 of the EIS. Section 3.9.4.6 of the EIS documents the existing management measures utilized by the Army to protect water resources. The State Department of Health (DOH) Safe Drinking Water Branch (SDWB) monitors groundwater quality of aquifers as described in EIS Section 3.9. SDWB has released groundwater contamination maps for Hawai‘i Island that show most contamination is along the eastern coast of the island. The DOH SDWB Environmental Health Portal can be accessed at <a href="https://eha-cloud.doh.hawaii.gov/sdwb/#!/home">https://eha-cloud.doh.hawaii.gov/sdwb/#!/home</a></p> <p>Section 3.5 Hazardous Substances and Hazardous Wastes presents the existing conditions from current activities at PTA and notes that risk of contaminants mobilizing is not a concern as limited surface water and groundwater pathways on the State-owned land pose minor potential impact to soil and groundwater quality. Section 3.5.4.11 describes the lack of mobilization of munitions constituents, including lead, within soil, groundwater, and surface water.</p>
Monisha Das Gupta		Additionally, the Army’s use of Pōhakuloa contributes soil erosion and exposes the communities to wildfire hazards.	Section 3.8.4.4 of the EIS documents the existing management measures utilized by the Army to protect and ensure the minimization of impacts on soil resources from and associated with training, including preventative measures and established procedures for the suppression and control of wildfires and the protection of human life, property, training infrastructures, and natural and cultural resources (USAG-PTA, 2019).

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
Monisha Das Gupta		My name is Monisha Das Gupta and I am a Honolulu resident. I am writing as an individual, a community member who has ties to Hawai'i Island, and as a person who cares deeply about stewarding our precious ecology and our neighbor island communities. I am writing in strong support of the No Action Alternative, which will return the current state-leased lands to the state after the lease expires in 2029. I am responding to the second draft of the EIS report to state my concerns: The report is not transparent about the extent of damage done to the biological resources at Pōhakuloa, which is home to critically endangered plants and other life forms. The Hawaiian hoary bat is just one of them impacted by the July 20, 2022 fire started inadvertently by the Army in the area. This is only one of the 37 fires the Army has caused over the years. As long as the Army retains control of the State-owned lands, native species are threatened by continued mismanagement and negligence of a designated conservation district by the 1961 Hawaii State Land Use Law.	Section 3.3.4.2 discuss landscape and ecological impacts from the most recent PTA fires in 2018, 2021, and 2022. Section 3.16.4, Wildland Fire Management includes information on PTA fire response capabilities and future plans for wildland fire response improvements. See Section 3.16.4, Wildland Fire Management for fire statistics. The text in Section 3.16.4 has been revised with additional information on historical wildland fires that have occurred on State-owned land and a table has been added summarizing historical fires documented on State-owned land since 2012. Additional text has been added to Section 3.16 regarding increased wildfire risk as a result of climate change. Mitigation measures the Army proposes include (1) negotiation of an agreement with the State to monitor wildfires on land not retained and (2) implementation of additional thermal technology. These mitigation measures have been added to the Mitigation Measures subsection.
Diane Hahn		Please refrain from using native Hawaiian land for military purposes. The land is being destroyed and in order for future generations to benefit from the land, we need to return it to indigenous protection.	Please see General Response 1.
Geoffrey Hajim		In no way shape or form should live fire training happen within the precious ecosystem of Hawai'i.  Malama pono	Please see General Response 1.
Mark Hamamoto		Aloha , this is Mark Hamamoto. I am a member of Church of the Crossroads in Honolulu, Hawai'i, the United Church of Christ, our congregation, and I'm also the founder of Mohala Farms, which is a nonprofit educational, organic farm in Waialua on the north shore of O'ahu. I am calling to provide this testimony in favor of not extending the lease for the Pōhakuloa training site to the US military. I believe that it is time for the military to vacate that land and to actually remodel the way that they are looking at providing national security for the islands. for our nation and for the world. There needs to be some big changes in order to actually provide real security in this world. And	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		the further use of the Pōhakuloa training area is not necessary and should be returned to the people of Hawai'i. Mahalo.	
Meagan Harden		Aloha, my name is Megan Harden. I'm calling as an individual about the Second Draft of the Environmental Impact Statement. And I'm concerned because the significant environmental impacts seem to be not really present in this impact statement. There are still contaminants already from the tests that have happened. It doesn't seem like there has been a fair assessment of the land and of the concerns that Native Hawaiian practitioners have raised. So I am very concerned about this impact statement. And think that it needs to be taken much more seriously if these trainings are going to continue, which they probably shouldn't. Thank you.	Please see General Response 1.
Cory Harden		I'm Cory Harden. The army should not be allowed to retain the land. The military is a bad actor that has caused irreversible harm to the land and waters throughout Hawaii, Kapūkakī - Red Hill - contaminated groundwater and sickened thousands of people on numerous former military sites statewide. And in the impact area of Pohakuloa, toxins and unexploded ordinance have been left languishing for decades. The army says it'll clean up Pohakuloa when and if the base is closed, but the cleanup at Kaho'olawe, Waikane, and Makua has been woefully inadequate. The army's current lease does not require them to fully clean up the land if the cost of cleanup would be more than the fair market value of the land. So they can lay waste to the land with unexploded ordinance, toxins, and wildfires, and then claim the market value was now little or nothing and never have the money to clean up. Military projects being monied to Hawaii Island by economic analysis do not include the eventual cost of cleanup after base closure, which is going to be astronomical, does not cover the cost of lost opportunities for other uses of the land. Other uses might be agriculture that provides food from crops and livestock, plus building materials, renewable energy projects, a part that preserves cultural resources, educates the public about history and culture, and allow us outdoor activities. The	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>military keeps saying, "Oh, we can't (inaudible) about Pohakuloa," but they made the same claims about Kaho'olawe and about Kapūkakī, Red Hill. Kyle Kajihiro of Oahu says, "The Army seeks to change 'āina into the commodity of real estate. This trick of abstraction is one of the insidious weapons settler colonial states used to alienate indigenous people from their ancestral connections to the land." And a testifier in a meeting, Martin Kamaka, said, "The 'āina is not a commodity that can be bought and sold with no thought as to its spiritual, historical, emotional and physical connections to Kānaka Maoli and/or lāhui. The army should restore the land and return it to the people." Thank you.</p>	
Cory Harden		<p>The military should clean up all its hazardous waste in our oceans before taking any actions to retain leased military lands.  <a href="https://www.hawaiinewsnow.com/2024/05/31/military-backs-new-work-locate-safely-detonate-wartime-munitions-dumped-off-hawaii/">https://www.hawaiinewsnow.com/2024/05/31/military-backs-new-work-locate-safely-detonate-wartime-munitions-dumped-off-hawaii/</a></p>	Please see General Response 1.
Isaac "Paka" Harp		<p>My name is Issac Harp, also known as Paka. I wish I could say it's a pleasure to be here today, but that would be a lie. I am Kānaka Maoli, descended from generations of lawai'a, fishers, extending back beyond the time when the United States hijacked my country, the Hawaiian kingdom in the late 1800s, thereby initiating an extremely prolonged belligerent military occupation, which continues today. So under our current situation, we are an occupied country, and occupier has initiated executive orders claiming to own our land. You don't own any land not taken by executive order. The state is an agent of the occupier. The state doesn't own any of our land. So the only alternative I would recommend is alternative for -- stop and go home. So I filed charges against the Army with a -- with a Nuclear Regulatory Commission a few years ago for the unlawful possession of depleted uranium after it was discovered that, in fact, depleted uranium was used at Pohakuloa -- and that should be expected. The Nuclear Regulatory Commission found the Army guilty but waived all penalties. I requested that civil penalties be issued against the Army for the clean up of depleted uranium</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		because the Army apparently is not volunteering to do so. I don't know if they can ever clean that up.	
Isaac "Paka" Harp		But my -- my final comment to you is, please obey international law of occupation and international humanitarian laws. Stop violating our human rights. Stop desecrating our 'āina and our ocean. Please clean up your toxic messes, including the depleted uranium and just go home. The U.S. military is not welcome here. Thank you.	Please see General Response 1.
Isaac "Paka" Harp		But I'm good friends with Dr. Lorrin Pang and he -- he is -- he is a Army medical officer for many -- many years, as well and he is a chief medical officer of Maui County, I believe right now. And in his opinion every time the area is bombed, you're -- and depleted uranium particles -- fine particles, which are the most dangerous form of depleted uranium. When it's tiny particles like that and you ingest it and it imbeds itself deep in your lungs, and then it begins a process of mutation -- mutation. This is most dangerous for young people because the mutation that happens to them, are passed onto their offspring. And you know, currently the Army doesn't even know exactly where the depleted uranium is, so that -- the bombing should stop everywhere. I could go on and on, but I try to be a man of few words but sometimes it's difficult.	See Sections 3.5.4.12 and 3.6.4 for a discussion on depleted uranium and the Army's 2009 air quality monitoring program, which concluded depleted uranium had not impacted air quality at PTA or in the surrounding area.
Issac "Paka" Harp		But I would be remiss if I did not mention, after hearing Pua and some other individuals speak, an issue that my wife has raised over and over and is -- a traumatic psychological impact of military -- United States military activities in Hawaii. So I would recommend the Army consider -- what do you call -- like post-traumatic stress syndrome pay, for all Kānaka Maoli within 100-mile radius of everyone of the 118 or so military installations in Hawaii. This is our country. You're causing extreme traumatic stress to our psyche and, you know, maybe that's -- that could be one of the reasons why we have such a large percentage of the prison population, our Kānaka Maoli, and why so many Kānaka Maoli are homeless but it just -- It's just very difficult to function in life when you have these kind of psychological stresses continually -- continually going on throughout your whole life from when you're born until when you die. So I believe	Discussion of the impacts on communities with environmental justice concerns from the Army's historical and current presence and mission activities is provided in Section 3.11.6.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
Issac "Paka" Harp		<p>the people, Kānaka Maoli, should be compensated for this psychological trauma that's been inflicted up on them.</p> <p>Issac Harp, also known as Paka. All I wanted to request -- if the Army could release the results for the studies on the water well that was drilled at Pohokuloa a few years ago, or it could be several years ago, because noticed that fresh water from Waimea is still being trucked up to Pohakuloa. So I'm wondering why this water well that was drilled Army up there is not being used. I suspect there's toxins in the water from all of the military activity. There's probably tons and tons of exotic metals, besides lead and depleted uranium up there, probably leaking into the ground and getting into the drinking water. And not only the water well drilled at Pohakuloa but the entire island. So this water goes down in the middle of the island and it spreads out from there and it even gets down to your ocean, so you are poisoning our ocean, as well if there's toxins in the water. I would really like to see the report from that water well and I'm sure a lot of our people would, as well. Mahalo.</p>	<p>The best available scientific data for groundwater and surface water quality was incorporated into this EIS. Groundwater and surface water quality are discussed in Section 3.9 of the EIS. Section 3.9.4.6 of the EIS documents the existing management measures utilized by the Army to protect water resources. The State Department of Health (DOH) Safe Drinking Water Branch (SDWB) monitors groundwater quality of aquifers as described in EIS Section 3.9. SDWB has released groundwater contamination maps for Hawai'i Island that show most contamination is along the eastern coast of the island. The DOH SDWB Environmental Health Portal can be accessed at <a href="https://eha-cloud.doh.hawaii.gov/sdwb/#!/home">https://eha-cloud.doh.hawaii.gov/sdwb/#!/home</a> Section 3.5 Hazardous Substances and Hazardous Wastes presents the existing conditions from current activities at PTA and notes that risk of contaminants mobilizing is not a concern as limited surface water and groundwater pathways on the State-owned land pose minor potential impact to soil and groundwater quality. Section 3.5.4.11 describes the lack of mobilization of munitions constituents, including lead, within soil, groundwater, and surface water. Groundwater extraction from State-owned land at PTA is not proposed as part of the Proposed Action. Section 3.9.4.2 has been updated to include additional information from the Thomas (2019) report. A link to this report has been added to the PTA EIS website (<a href="https://home.army.mil/hawaii/ptaeis/project-home">https://home.army.mil/hawaii/ptaeis/project-home</a>) under the "Documents" tab.</p>
Hannah Hartmann		<p>As I understand it, you are not supposed to make changes between the first and second draft of the CIA that are not directly in response to public comment. Why does the second draft only include 1/3rd of the details of the first? Why is there no public facing answer?</p>	<p>The first draft CIA was revised to improve readability, focus analysis within the project area and broad geographical area, and add information from new survey respondents and interviews. No information provided by the interviewee and survey respondents was removed from the DEIS CIA.</p>
Hannah Hartmann		<p>3.3.6 Environmental Analysis 3.3.6.1 Alt 1: Maximum Retention Level of significance The Army claims their current mitigation measures are sufficient. However,</p>	<p>Section 3.3.4 has been updated with more recent scientific data and surveys and wildland fire analysis in Section 3.3.6 has been revised.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		evidence from the Lielani wildfire and cumulative impacts from other Amy caused fires suggest a recurring, significant loss of critical habitat and endangered species. Please explain how, given the evidence, does it NOT warrant additional mitigation measures to prevent more ecological disasters like this from happening?	Mitigation measures the Army would consider include: (1) a multi-year research project to identify possible biological controls in the native range of <i>C. setaceus</i> (fountain grass); (2) installation invertebrate surveys; (3) an ungulate impact assessment; (4) negotiation of an agreement with the State to monitor wildfires on land not retained; and (5) implementation of additional thermal technology. These mitigation measures have been added to the Mitigation Measures subsection.
Hannah Hartmann		The entire burn scar from the Leilani fire at PTA had not been surveyed both pre and post fire. How can the Army claim there were less than significant cultural impacts due to the Leilani fire they caused? What is your reference point?	Section 3.4.4.5 has been revised to explain that all 25 previously recorded archaeological sites within the burn footprint on State-owned land have been subject to condition assessments which show no clear indication of damage or long-term impacts identified from the fire. The archaeological sites within the burn footprint lack surface archaeological deposits that may be affected by fire (e.g. mixed midden, etc.)
Hannah Hartmann	HULI PAC	The entire burn scar from the Leilani fire at PTA had not been surveyed both pre and post fire. How can the Army claim there were less than significant cultural impacts due to the Leilani fire they caused? What is your reference point?	Section 3.4.4.5 has been revised to explain that all 25 previously recorded archaeological sites within the burn footprint on State-owned land have been subject to condition assessments which show no clear indication of damage or long-term impacts identified from the fire. The archaeological sites within the burn footprint lack surface archaeological deposits that may be affected by fire (e.g. mixed midden, etc.).
Hannah Hartmann	HULI PAC	As I understand it, you are not supposed to make changes between the first and second draft of the CIA that are not directly in response to public comment. Why does the second draft only include 1/3rd of the details of the first? Why is there no public facing answer?	The first draft CIA was revised to improve readability, focus analysis within the project area and broad geographical area, and add information from new survey respondents and interviews. No information provided by the interviewee and survey respondents was removed from the DEIS CIA.
Hannah Hartmann	HULI PAC	3.3.6 Environmental Analysis 3.3.6.1 Alt 1: Maximum Retention Level of significance The Army claims their current mitigation measures are sufficient. However, evidence from the Lielani wildfire and cumulative impacts from other Amy caused fires suggest a recurring, significant loss of critical habitat and endangered species. Please explain how, given the evidence, does it	Section 3.3.4 and Appendix K have been updated with more recent scientific data and surveys and wildland fire analysis in Section 3.3.6 has been revised. Mitigation measures the Army would consider include: (1) a multi-year research project to identify possible biological controls in the native range of <i>C. setaceus</i> (fountain grass); (2) installation invertebrate surveys; (3) an ungulate impact assessment; (4) negotiation of an

**Responses to Second Draft EIS Comments**

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		NOT warrant additional mitigation measures to prevent more ecological disasters like this from happening?	agreement with the State to monitor wildfires on land not retained; and (5) implementation of additional thermal technology. These mitigation measures have been added to the Mitigation Measures subsection.
Chloe Hartwell		I testified in 2021 regarding HB499 Relating To Lease Extensions On Public Land, questioning the public benefit of bombing the land. Particularly in light of the historical precedent of the US Military failing to uphold leases and complete restoration work. When the federal government took over Kaho'olawe in the 50s, it agreed to return the land in a condition of "suitable habitation," I went to Kaho'olawe a couple of years after the U.S. Navy had had nearly a decade to clear ordinances and complete environmental restoration. We stepped past unexploded bombs, which remain after two more decades of clean-up work. Kahoolawe was bombed for 50 years. The impact of extended leases could take generations to heal or preclude future restoration entirely. Extended leases will further degrade our environment, pollute our limited freshwater supply and oceans, damage cultural sites, and harm endangered species. I have listened to the arguments about the Pacific's importance to US national security and the readiness of the joint force. There are many other training alternatives to live fire, and I believe our security would be better served by healthy communities with safe water, food security, restored ecosystems, and the opportunity for robust economic diversification to protect against future shocks. You might think this a naive oversimplification, but destroying the land does not occur in isolation from the people. Our precious, fragile Hawaiian islands cannot protect anyone if we devastate them. Mahalo, Chloe Hartwell Wailupe	Please see General Response 1.
Chloe Hartwell		Thank you for this opportunity to provide comments. I oppose the extension of the Army lease at Pōhakuloa. I support the "No Action Alternative," allowing the lease to expire and requiring the Army to comply with all lease terms, including the clean-up of these lands. I am concerned that other alternatives will further damage and pollute our fragile environment and continue to pose fire risks if the land is not allowed to be properly stewarded.	Chapter 4, Cumulative Impacts, provides an analysis of the cumulative impacts of the Proposed Action and lease compliance actions with past, present, and reasonably foreseeable future actions for all resource areas.  Sections 3.3.4 and 3.3.6 address the existing conditions and potential impacts on biological resources including native, protected, and invasive species. The Proposed

Responses to Second Draft EIS Comments

Commenter	Submitted By	Comment	Response
		<p>The EIS must take into account the long-term and cumulative deleterious impacts of the Army lease. Pōhakuloa is also home to endangered rare plants, endemic birds, the Hawaiian hoary bat, and more.</p>	<p>Action and lease compliance actions would have a variety of continued and potentially new impacts on threatened and endangered species, including continued, significant, adverse impacts on Hawaiian hoary bat habitat from potential training-related wildland fires.</p> <p>Section 4.4, Biological Resources, revised to clarify the potential cumulative impacts on biological resources.</p>
<p>Tamra Hayden</p>		<p>I lived in Hilo, brought my children up there. I used Saddle Road for work. I love Hawaiian Lands and truly believe they belong in Hawaiian Hands. The military has destroyed so much of Hawaiian Lands and waters. They do not respect the environment. Extending this lease is a bad idea. They have said they will not clean up the exploded and unexploded ordinances because it is too dangerous. Let us clean it up like we did Ko'olawe. Let us makes sure any water ways and the land managed to benefit the Hawaiian people. The military has lied to us consistently and now is giving the taxpayers the bill to clean up Red Hill. They have lied for decades about Pearl Harbor. The land at Pohakuloa is zoned state Conservation land, the highest protected land status. The land may not have been zoned Conservation in '64 when the lease was first issued, but it is State Conservation District now. So, no lease renewal. No action alternative. No land swaps. Stop the bombing and desecration. Return the land to the kanaka maoli. Pay reparations for destruction of the land and psychological injuries caused by your 75 years of bombing Pohakuloa. We no longer trust them. Extending leases to a group who disrespects our lands, our waters, our people and our culture. As a 36 year resident I say. Aole Military!!</p>	<p>Please see General Response 1.</p>
<p>David Heaukulani</p>		<p>Aloha no. Ke kāko’o nei au i ka noi a ka ‘Amelika Hui Pū ‘Ia e ho’omau i ka ho’olimalima ‘ana i nā ‘āina ‘o Pohakuloa no ka ho’oma’ama’a kua. Ho’omaopopo wau i nā kumu i hā’awi ‘ia no nā hō’ike āpau e hō’ole i ka noi e ho’omau i ka ho’olimalima. Ke noi aku nei au e no’ono’o nui ‘ia kēlā mau hopohopo a e wehewehe ka pū’ali koa pehea e ho’oponopono ai i kēlā mau pilikia. ‘O nā mea ‘ekolu a’u e kama’ilio nei, ‘o ia ka helu ‘ekahi: ‘o ka mea i mana’o ‘ia he pō’ino i ka aquafier mokupuni. Helu ‘elua: ‘o ka lepo</p>	<p>Sections 3.5.4.11 and 3.5.4.12 describe the lack of mobilization of munitions constituents within soil, groundwater, and surface water. The text notes that risk of contaminants mobilizing is not a concern as limited surface water and groundwater pathways on the State-owned land pose minor potential impact to soil and groundwater quality.</p> <p>The best available scientific data for groundwater and</p>

Responses to Second Draft EIS Comments

Commenter	Submitted By	Comment	Response
		<p>radioactive i mana’o ‘ia mai ka pau ‘ana o nā pu uranium. A me ka helu ‘ekolu: he aha ka mea e hana ai me UXO. No ka mea, ‘o ko’u kāko’o ‘ana i ke noi e ho’ohou i ka ho’olimalima e pili ana i ka pono e loa’a iā Hawai’i ka mana pale o ‘Amelika Hui Pū ‘Ia. Ke mana’o’i’o nei au he mea pale aku ‘o ‘Amelika i nā ho’olālā ho’onui e Communist China. Pono wale kekahi e nānā i ka ho’opa’apa’a ma ka Scarborough Shoal ma waena o Kina a me Phillipines. Aia ka Shoal i ka ‘āpana waiwai kū’oko’a o ka Phillipines. Ua ho’oholo ka ‘Aha Ho’okolokolo Ki’eki’e ma Hague i ke kānāwai o Kina. Ho’owahāwahā wale ‘o Kina i ka ho’oholo. Pono wau e ho’ohui he kanaka koa au. Ua hana au ma ke Ke’ena ‘Oihana o ‘Amelika Hui Pū ‘Ia a ua hana au ma Pohakuloa. Loa’a ia’u kahi penikala ho’omaha mai ‘Amelika Hui Pū ‘Ia. Ua loa’a ia’u nā kēkelē kulanui ‘ekolu i ho’oikaika ‘ia e ka G. I. Bill. Loa’a ia’u nā uku no ke kino kīnā o Veteran’s Affairs mai ke Aupuni Hui Pū ‘Ia. No laila, hiki iā ‘oe ke ‘ōlelo ma’alahi i ka’u hō’ike ‘ana i ka mana’o o ka pū’ali koa. Ma kekahi ‘ao’ao, ua hānau ‘ia au ma ka ‘ao’ao Hikina o Mauna Kea ma ka Apana o Hamakua. Aia nō i ko’u ‘ohana ka ‘āina ma laila. He kanahikukūmālima pākēneka ko’u koko Hawai’i. He kūpuna au o kanawalukūmāono makahiki. Noho au ma Hilo. No laila, he kuleana ko’u e kama’ilio ma kēia kumuhana. I ka hopena, ke kāko’o nei au i ke noi e ho’ohou i ka ho’olimalima no ka ho’ohana ‘ana i nā ‘āina ‘o Pokahuloa no ka ho’oma’ama’a kua. Aloha no. David Heaukulani, PhD</p> <p>-----</p> <p>Translation:</p> <p>Greetings. I am supporting the request of the United States to continue in the leasing of the Pohakuloa lands for military training. I understand the reasons given for all the evidence to deny the request to continue the lease. I ask that those concerns be given serious consideration and that the military explain how to address those concerns. The three topics that I would like to discuss is number one: the supposed damage to the island aquifer.</p>	<p>surface water quality was incorporated into this EIS. Section 3.9.4.6 documents the existing management measures used by the Army to protect water resources. The State Department of Health (DOH) Safe Drinking Water Branch (SDWB) monitors groundwater quality of aquifers as described in Section 3.9. The DOH SDWB has released groundwater contamination maps for Hawai’i Island that show most contamination is along the eastern coast of the island. The DOH SDWB Environmental Health Portal is available at <a href="https://eha-cloud.doh.hawaii.gov/sdwb/#!/home">https://eha-cloud.doh.hawaii.gov/sdwb/#!/home</a>.</p> <p>Sections 3.5.4.12 and 3.6.4 contain a discussion on depleted uranium and the Army's 2009 air quality monitoring program, which concluded that depleted uranium had not impacted air quality at PTA or in the surrounding area.</p> <p>Section 3.5.6 describes the cleanup activities to be performed on any State-owned land not retained.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>Number two: radioactive fallout from depleted uranium mines. And number three: what to do with UXO. Because my support of the request for renewing the lease is based on the need for Hawaii to have the protection of the United States of America I believe America is a deterrent to expansionist plans by Communist China. One need only look at the dispute over the Scarborough Shoal between China and the Philippines. The Shoal is in the exclusive economic zone of the Philippines. The High Court in The Hague ruled in favor of China's law. China simply ignores the decision. I must add that that I am a soldier. I worked at the United States Department of Commerce, and I worked in Pohakuloa. My retirement pension is from the United States. I have three college degrees that were supported by the GI Bill. I receive Veteran's Affairs disability benefits from the United States. So, you can easily say that I am expressing the opinion of the army. On the other hand, I was born on the Eastern side of Mauna Kea in the Hamakua District. My family still owns the land there. I am 75% Hawaiian blood. I am an elder of 86 years of age. I live in Hilo. Therefore, I have the right to speak on this topic. In conclusion, I support the request to renew the lease for the use of the lands at Pohakuloa for military training. Sincerely, David Heaukulani, PhD.</p>	
Deborah Hecht		<p>Aloha, my name is Deborah Hecht I live in Kailua Kona]. I OPPOSE THE PROPOSED ACTION OF THE MILITARY TO KEEP USING approximately 22,750 acres of State-leased lands once the lease expires in 2029. I SUPPORT THE NO ACTION ALTERNATIVE IN THE EIS. under which the State lands will be relinquished back to the State.</p>	Please see General Response 1.
Deborah Hecht		<p>This land is in the middle of our island, depleted uranium from bombs used years ago pollute our environment's air and water resources. People hear the maneuvers. This does not serve the greater good of the environmental health of the island or the health of our residents and it violates the public trust. I have driven across Saddle Road at night and seen tracers and heard bombs going off. This was before I knew that they did maneuvers at Puhakuloa. I thought we were in the middle of world war 3. During the November eruption of Mauna Loa, traffic was routed</p>	<p>Sections 3.5.4.11 and 3.5.4.12 describe the lack of mobilization of munitions constituents, including depleted uranium. Section 3.5.4.12 discusses the various studies of depleted uranium at PTA, including archival research, site reconnaissance, radiological instrumentation, soil samples, air samples, and a health and risk assessment, and notes that surveys found no indication of depleted uranium within the State-owned land. Sections 3.5.4.12 and 3.6.4 note: The Army completed a 1-year airborne uranium monitoring</p>

Responses to Second Draft EIS Comments

Commenter	Submitted By	Comment	Response
		<p>through Puhakuloa, and a tourist found unexploded live ordinance. How many more of these bombs and disasters waiting to happen should residents be exposed to?</p>	<p>program in 2009 to determine if the decay and vaporization of DU fragments has impacted local air quality. The monitoring program collected 210 air samples from three sites upwind and downwind of PTA to provide a basis of comparison. The monitoring program concluded that the DU had not impacted air quality at PTA or in the surrounding area because the total airborne uranium levels in the collected particulate matter samples were within the range of naturally occurring uranium in Hawaiian soils and rock and were several orders of magnitude below U.S. and international chemical and radiological health guidelines. Section 3.5.4.12 states surveys found no indication of depleted uranium-containing materials on the State-owned land. Section 3.5.6 notes the Army would continue to follow the Nuclear Regulatory Commission-approved Safety and Environmental Radiation Monitoring plans to monitor for potential depleted uranium migration. Conditions of the Nuclear Regulatory Commission-approved Safety and Environmental Radiation Monitoring plans are in Section 3.5.4.12. Section 3.5.4.11 notes that the migration of munitions constituents at PTA is limited due to limited surface water and groundwater pathways because of low rainfall, lack of perennial streams, and the deep depth to the groundwater aquifer.</p>
Deborah Hecht		<p>Yes, I am a NIMBY, I do not want these dangerous chemicals leaching into our water reserves; Numerous metals and chemicals are listed in 3.5.4.3, such as lead, copper, and antimony. The BAX V-10 was constructed only 13 years ago and already contains dangerous levels of these metals. I worry that these will break down over time and make their way downslope as airborne particulates or infiltrate our watershed. It is also admitted that future cleanup efforts may include "emerging contaminants" that are as yet unknown, which is unsettling.</p>	<p>Sections 3.5.4.11 and 3.5.4.12 describe the lack of mobilization of munitions constituents, including depleted uranium, within soil, groundwater, and surface water. The text notes that risk of contaminants mobilizing is not a concern as limited surface water and groundwater pathways on the State-owned land pose minor potential impact to soil and groundwater quality.</p> <p>The best available scientific data for groundwater and surface water quality was incorporated into this EIS. Section 3.9.4.6 documents the existing management measures used by the Army to protect water resources. The State Department of Health (DOH) Safe Drinking Water Branch (SDWB) monitors groundwater quality of aquifers as described in Section 3.9. The DOH SDWB has</p>

Responses to Second Draft EIS Comments

Commenter	Submitted By	Comment	Response
			<p>released groundwater contamination maps for Hawai'i Island that show most contamination is along the eastern coast of the island. The DOH SDWB Environmental Health Portal is available at <a href="https://eha-cloud.doh.hawaii.gov/sdwb/#!/home">https://eha-cloud.doh.hawaii.gov/sdwb/#!/home</a>.</p> <p>Sections 3.5.4.12 and 3.6.4 contain a discussion on depleted uranium and the Army's 2009 air quality monitoring program, which concluded that depleted uranium had not impacted air quality at PTA or in the surrounding area.</p>
Deborah Hecht		<p>Throughout the EIS, there are inconsistencies in reference to cleanup of the State-leased lands. In some sections of the EIS, cleanup (and even reforestation) is written about as a matter-of-fact action; in others, cleanup is referred to in less certain terms. To my knowledge, nothing has been done about clean-up, but maneuvers continue doing touch and goes at the airport and landing vehicles, tanks etc. at Kawaihae and transporting them to Puhakuloa. Please stop, clean up the land and let it return to its natural state. Most sincerely and with aloha, Deborah Hecht PO Box 3395 Kailua Kona, HI 96745</p>	<p>The current status of range management activities regarding hazardous substances and hazardous wastes is discussed in Section 3.5.4.</p> <p>Section 3.5.6 describes the cleanup activities to be performed on any State-owned land not retained.</p>
Tuupua Helekahi		<p>Another thing, reading the posters, you guys were talking about how Hawaii is so important to the military, but when you read the posters, it's only for training. You guys only look at us as a place to practice -- practice war, but there's no war. When was the last time we sent troops to a country to actually fight and bomb places? It's -- it hasn't happened for a long time. Why do we still see the necessity in doing these things? I have a brother-in-law who works in the -- who's in the military on Oahu and he actually wants to leave because he finds it so -- like there's no sense in going to training areas. He comes here to Puhakuloa and there's training here, but he's still -- but he's like, "Why are we doing it? Where is the benefit of us coming over here and training?"</p>	<p>Please see General Response 1.</p>
Tuupua Helekahi		<p>Aloha mai kākou. I am Tuupua Helekahi. I am originally born and raised from Hāna, Maui, but I have moved here to Hilo to attend UH Hilo where I am now currently, after this semester, a senior. I didn't -- I wasn't planning to</p>	<p>Appendix A of the EIS contains a NEPA-HEPA Compliance Table that outlines the rules and the EIS section in which those rules are addressed.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>come tonight. I definitely wasn't planning to speak. But then after especially reading the posters about the environmental -- your guys' environmental impact statement, I studied NEPA and HEPA from an anthropologist who's worked with the state and federally with them, and he has showed a lot of things in -- within our class of how there are many loopholes to go around HEPA and NEPA. And that no matter -- no matter what, if you have money and if you have pull, it goes your way. It doesn't matter what the law says; there are always ways around it. Sorry, I took notes because I didn't -- I wasn't planning to speak. So one question I had was, how do we know that you guys aren't breaking these laws? How do we know that you guys are actually following the HEPA and NEPA laws set in place, regulations set in place, and all of the processes that it goes through? Because just to form the H-3 and H-1 on Oahu, they were already breaking HEPA and NEPA laws and that -- that was -- already shouldn't have been made. That's -- and that was just state and federal decision.</p>	
Tuupua Helekahi		<p>But he's -- he's been in the military for 34 years and he hasn't gone to a war. He's gone to deployment and to like look at -- like hang out in other countries pretty much and just, you know, walk around with their guns in neighborhoods, kind of like -- it's sad to put people in places like that. It's really sad. And to use our land only as a place to train is heartbreaking. Because you guys don't look at the beauty of it. And you guys don't look at why -- why Hawaii shouldn't -- why this shouldn't be happening in Hawaii. And the last thing I want to point out, because I know I'm going over time, I took a post -- I took a photo of the poster that was talking about the potential environmental impacts. And when you look at you guys, you know, you have the significant adverse impact and the less than significant impact, and the other two. When you look at every single alternative there, it looks this exact same. There's not one change in any alternative that is different. So why would we want to renew the lease when there's no changes actually being made? And you showed us in this -- in this graph that you drew for us. That's why</p>	<p>The Potential Environmental Impacts poster presented at the Second Draft EIS public meetings was a broad simplification to enable summarization of the potential impacts on the poster. Refer to Section 3.17.1 of the EIS for a detailed summary of the potential impacts.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>the only one should -- that the only alternative that should be looked at is alternative 4 where the lease isn't renewed. And I'm going to end it there. Thank you. Mahalo.</p>	
Jennifer Ho		<p>I do not want the army to continue to fire missiles, or shoot round, or guns, or detonate ordinance, or blow up or otherwise add to the pollution and sickness that the architects of war pretend they aren't doing to all of us, including you. It's for your own good that I choose option 4, No renewal of lease no tenure of land. No, Pohakuloa must not be given to the military. At this time they have proved themselves incapable of being good stewards of life, on land and sea and air. You have taken just pride in improving your stewardship of land and native species and following EPA and NEPA requirements, but as long as you are blowing things up you poison land sea and air. That's not protecting America. It doesn't take reading an EIS to see the contradiction. Anyone hiding behind "I'm just doing what I was told to do" is not a hero. Use your ability to be a team, and work together for a common goal to heal this country, not practice for war. War makes everyone a loser. Rehearsing for war- war games on land or at sea is making actual war on the environment. The United States of America, unlike any other nations, maintains a massive network of foreign military bases around the world. How was this created and how or why is it continued? America must stop making war on the world, whether indirectly by arms trade or directly by intervention. Like Pohakuloa, some of these military installations are on land occupied as spoils of war. Most are maintained through collaborations with governments, including brutal and oppressive governments benefiting from the bases' presence. In many cases, human trafficking rises where military, including NATO bases exist as an unwelcome presence. Did you join the military to support the country you love, or just to find a job in a bleak opportunity of choices? It's time you looked closely at how we the taxpayers, including your brothers and sisters in the military are manipulated into aggression for no honest need. There were no weapons of mass</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>destruction in Iraq. If Afghanistan and Iraq were not oil rich countries you would not be there protecting private contractors who work for Halliburton and all the rest. Why should we trust you? Haven't promises to remove the pollution from those who came before you left us all stuck in an impossible situation? Military poisons haven't been cleaned up here in Hawaii or around the world. As long as the military is training for war, you are training to make the earth uninhabitable for all life. Past and present groups or countries America supports with military might are not countries with the capability to invade America. War has destabilized the global economy. Appeals from organizations fill up my mailbox asking for donations to fix the problems created by my tax dollars that against the will of the American people continue to enrich corporate arms dealers and manufacturers. The military has the behavior of an enabled family member who cannot admit it's addiction. Most of us want to pretend that there isn't a problem, and don't know how to stop the out of control addict. After all, many of us have family that were in the military and it's painful to admit to oneself that there is a problem. But there is a big problem every way you look at it. The industry that equips us for war pollutes everyone's environment. Cancers continue to rise, areas of land are unfit for habitation. Schools and hospitals are underfunded while the Pentagon's budget is never made accountable. Stop! In war no one wins. Be honest, reform the military, use your ability to work together, your strength in impossible situations to stop invasive species, restore habitats rescue the endangered. Be actual heroes!! The whole world will applaud! America will be loved again. Even if anyone were to threaten us, we would have so many allies simply because we would be the good guys again. We are NOT the good guys now. Stop robbing us of poets we will never hear, inventors we will never benefit from. Every human being is unique, a potential gift, but as we destroy other countries and destabilize economies, and PTSD increases, how will we see those unique gifts that will never have a chance to flourish? They won't flourish because the arms dealers own you, own our</p>	

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		country. If you weren't training how to kill people I could gladly want you to have Pohakuloa.	
Jennifer Ho		<p>My name is Jennifer Ho. I live in Hilo. I have lived on the Big Island for close to 45 years, most of my life. I am against extending the lease at Pohakuloa. And I know that you joined whatever branch of the service to serve the country. And what I would invite us all here to think about, because of course it's heroic to serve the country, and we imagine that you're joining and seeing yourself in that role to do good and yet you've gotten manipulated. All of us have been manipulated by what being that hero really means. So heroism gets tied and linked with being a warrior. And I invite us all to redefine what being a hero is not specifically about war because war hurts anything and everything. And here you are, you've learned to work together in amazing teamship, team comradery where you can rely on each other. And these are things that if you come out whole after your years of service, you look back on with pride how it's made you make your bed really tight you can bounce a coin off of it or you have friends you can call up and, you know, you've all polished your boots together and you -- you've gone through this together. So that I understand. That's strengthening. But when you really look -- when you look under the covers, what's really going on? The militarism that has taken over the world created a situation where you are supposed to be the watchdogs of countries that aren't even really a threat to us. None of these countries are a threat to us. The tip of the spear pointing itself at China or whatever little, weak country or however we supply military aid to somebody because that's funded by tax dollars, which really is just a way for the military industrial establishment to make more money, and it's moving the positions around the pawns on the -- on the playing board. Every act of rehearsing for war is actual war on the environment. If you're not allowed to do war because you're near where people live, then where do you go? You go to where nobody lives, but who lives there? The animals that don't have a chance to live anywhere else. So then you're making maybe not a real war, but you're driving your</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>equipment where the animals that try to nest there, they can't nest there. They can't survive. So what I invite you to do, because I know you want to see yourself as honorable citizens, is to shift this dialogue away from calling a warrior a hero because in war the weak lose. But the only situation where a war was really won was Gandhi's war; and they were the weakest and they did not fight. So you cannot win by fighting. Look what happened in -- in America's South, they never gave up. They still are angry at how they were in a war. They're -- south is angry at the north. That war did not succeed. War does not succeed. If you want to create that incredible comradeship that you guys have together, go to war against invasive species, scale that cliff and take out the -- rescue the important thing. Take out the (inaudible) that are on the bottom of some ship that are causing havoc to fisheries. If you're going to go to war, don't go to war, go to being a protector. Shift the dialogue. Being a warrior is not heroic. And I invite you to not go from Pohakuloa to some other place; they don't want it either. Join with us, get the American industrial complex, excuse me, military industrial complex to break up and go away, because what you guys do in your comradeship is admirable. But what war does is not admirable and you know that because you're human beings. You're -- you're like I am. You can feel it. You have a heart. You know. You know. I know you do. Thank you for being open to what we have to say. Please take it further. Make it just. Aloha.</p>	
Leinā'ala Ho'āeae		<p>Dear Jeff Overton, What's the point of using Hawaiian land that is valued as exploitable for profit for bombing, especially when you don't even know the extent of the damages? Perhaps you would like another Kaho'olawe? People pay thousands to see the beautiful beaches, lush forests, tiki bars, and bragging rights back home. The US military has access to so much land in the continental states that could be used for practice without contest. Hawaiians will be a persistent and determined advocate for our lands, we just want to take care of it so there's something to be enjoyed for generations to come. Who does that benefit? Everyone. In benefits the children who</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>will live here for generation, and it benefits tourists who will visit for generations. How can we reach you in a way that you can understand why this is so important to us? How can we reach you in a way for you to respect and appreciate our values? How can we reach a mutual understanding and respect, to have a healthy conversation, or even respectfully agree-to-disagree? We are not looking to kick you and yours out, we are not looking to make your 'ohana move out, we just want to take care of our home and our community which involves ALL residents. If we can start with letting Hawaiians care for our home and communities, we can start reducing all the negativity and anger and pointless one-sided yelling, crying, and mocking. Know that Hawaiian anger comes from hurt and sadness for seeing our beloved home and people be mistreated, made unliveable, and fear that our children (that includes yours) will not be able to thrive and enjoy life here. I know things get really intense trying to understand where we are coming from, but people are tired. Learning our history fills one with rage and sorrow. If you are truly the good guys in history, let us take care of Hawai'i, let us take care of ourselves, and then we can take care of you in a positive way—instead of the tension of anger that we have now. Please stop bombing our home, you know damn well there's not much of it compared to even just one US continental state. Like Oklahoma or something. We love it as much if not more than you do. Let us show you what that looks like in our lifetime. Sincerely, Leinā'ala Ho'āeae Kāne'ohe, HI 96744</p>	
Jaime Hoe		<p>I am viciously against the military being able to extend their lease for Pohakuloa. The military is actively desecrating sacred land that has been alive longer than the US imperial empire has. This space holds cultural and traditional meaning that gets chipped away every time the military engages in any sort of activity here. Our Hawaiian people are houseless on their own land, kicked out then surrounded by active military sites. Our ancestors survived for millennia here with everyone being provided for. This land belongs to Hawaiians first and foremost, the true</p>	Please see General Response 1.

Responses to Second Draft EIS Comments

Commenter	Submitted By	Comment	Response
Fred Hofer		<p>stewards of this land, in order to reconnect with our identity.</p> <p>I strongly oppose further presence of the US military on the illegally occupied lands of the Kingdom of the Hawaiian Islands. The US military bases are the worst polluter worldwide, even worse than extractive industries. The US military did not abide by the conditions of the old lease, for example the obligation that clean up after each "exercise" The lands at pohakuloa have been shelled and bombed for over 70 years now, with a wide range of toxins, including Depleted Uranium. The US military is breaking international law wherever they go "exporting democracy" Their presence on Syria is a war crime They have to legitimate reason to be there, hold and extract the Syrian oilfields. This constitutes illegal occupation and plundering! A clear war crime. I oppose the continued presence of the US military here in Hawaii and their training for Illegal occupation, pilfering and plundering. "Initiating regime change" an euphemism for toppling legitimate governments. With all due respect Fred Hofer, Hilo, H.I.</p>	<p>The Army's range management activities after training exercises are discussed in Section 3.5.4.11. The text notes that the Army removes or deactivates all live and blank ammunition upon completion of a training exercise in compliance with the lease and removes spent munitions items, wood boxes, and other trash prior to departing a training area or range facility in accordance with the Pohakuloa Training Area Range Operations Standard Operating Procedures and the U.S. Army Garrison, Pohakuloa External Standard Operating Procedures. Sections 3.5 and 3.15 include information from the Pohakuloa Training Area Range Operations Standard Operating Procedures regarding cleaning ranges after training.</p> <p>Sections 3.2.4 and 3.5.4 state that DLNR has implemented the Court Ordered Management Plan and site visits are occurring. Army has received no corrective action requirements from the site visits.</p> <p>Sections 3.5.4.11 and 3.5.4.12 describe the lack of mobilization of munitions constituents, including depleted uranium, within soil, groundwater, and surface water.</p>
Paleka Hookano		<p>Aloha. My name is Paleka. I'm not originally from the big island. I was -- I am from Maui, just like I see people here, as well. I really appreciate all the Kanaka here setting the foundation for everybody here. There is young people like me that don't know nothing about this. This is crazy to me. It's just very sad. It's just very -- very -- very different nowadays. It's -- it's good for us to have these conversations for sure. I would like to elaborate on the part of the bombings on Kaho'olawe , as well. I personally haven't experienced it, but I hear the stories. Very traumatic for a lot of my family members just hearing that. Now listening to this bombing and potentially the aquifers and all of this happening, I worry for my children -- my kūpuna that could possibly end up in the same situation,</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>whether it's getting sick from all of these aquifer pollution or all this lead poisoning in the air. And it's really hard to make these meetings, as well. I'm actually not from Waimea side or the west side, as -- as well. I'm actually from Mountain View or living now in Mountain View. So I have a long drive back home and I have a son here, he is currently waiting in the car. It's is not really too ideal for him to be out this late. So I just want to mahalo everybody. I appreciate all you folks, especially in opposition to this. I'm also standing in opposition to this, as well -- but mahalo.</p>	
Bailee Houle		<p>Demilitarize Hawaii Now. May every person involved in dropping bombs feel them fully in their after life and next life. So much shame. Get the fuck out of Hawaii. All you do the land, the soil, the life here. Th US army is the most immoral structure on this planet. They are the cause of all pain and suffering in this world. May you all burn in hell.</p>	Please see General Response 1.
Bella Hutchinson		<p>Stop bombing our island! The military has ample space on the continent to conduct their training exercises. You don't need Pohakuloa. I am 100% against renewing the PTA lease as well as against any option to purchase that land fee simple!</p>	Please see General Response 1.
Kilihea Inaba		<p>Pōhakuloa EIS Testimony                      Aloha, my name is Kilihea Inaba and I am from Kaloko, Kona. My family spans generations in these islands, tracking my Hawaiian ancestors to the beginning of time here in Hawai'i. I am speaking on behalf of myself, my infant son, and the generations to come that have already been affected by the U.S. military's occupation of Pōhakuloa. I am writing in opposition to the Army's Proposed Action to continue their retention of approximately 22,750 acres of State-leased lands once the lease expires in 2029, either through a new lease or through purchase. I am in full support of the No Action Alternative, under which the State lands will be relinquished back to the State.</p>	Please see General Response 1.
Kilihea Inaba		<p>Conclusion                      In conclusion, I support the No Action Alternative by which the State-leased lands will return to the State in 2029. Throughout the second draft EIS, it is made very clear that</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>the No Action Alternative consistently results in significant, beneficial impacts, to the land, waters, and beings of this island, as opposed to the numerous adverse impacts that would result from Alternative 1. The Army has mistreated the lands of Pōhakuloa, threatening human health and the health of our greater environment for years now. The Army needs to clean up the State-leased lands and return them in better condition. I implore the State to not consider re-leasing these lands or selling these lands to the Army in the future. Mahalo for your time, Kilihea Inaba Kaloko, Kona, Hawai'i</p>	
Kilihea Inaba		<p>3.4 It is important to note that all land and waters here in Hawai'i are considered sacred and culturally significant for various reasons (not all of which are listed in the EIS). This area can no longer be frequented by indigenous people for passageway or for cultural and ceremonial practices as it was prior to the Army's occupation and it is hard to imagine how safe it could be even after de-occupation because of the many UXO we know are present in this land area. This section also states that McCoy &amp; Orr's 2012 "is the only TCP study commissioned by the Army for study and/or assessment of TCPs within PTA." I am unable to locate this study on the internet. Furthermore, more than one study should be conducted.</p>	<p>Compliance with HAR Chapter 13-5, Conservation District, has been revised and is discussed in Sections 1.4.2 and 5.3.2. Sections 1.4.2, 3.2, and 5.3.2 have also been revised to make clear that for analysis purposes, the EIS assumes BLNR would establish a special subzone in the conservation district through a rule amendment that allows for military training use.</p>
Kilihea Inaba		<p>3.3 This section states that the "2021 Leilani fire affected 5,254 acres of threatened and endangered species habitat at PTA." In addition, land that could be used by the endangered hoary bat ('ōpe'ape'a) for habitation was also burned. The fact that "about" 50% of the Pu'u Anahaulu game management area grasslands encompassing of 2,500 acres of 'ōhi'a/ native forest habitat was burned is unacceptable. Lastly, the statement that "there is evidence that some plants have regenerated from roots, despite being burned in the fire" is inconsequential as "some" holds no weight here. Though the EIS states that PTA has implemented conservation measures, it is insufficient in comparison to the damage and desecration that continues to be done on a regular basis through normal training operations and in the instance of the</p>	<p>Section 3.3.4 has been updated with more recent scientific data and surveys. PTA Natural Resources staff conduct ongoing monitoring of the area to continue to assess species recovery. The Army is committed to protecting and improving biodiversity at PTA through ecosystem management approaches as guided through the INRMP. Despite wildland fires, the biodiversity of native Hawaiian species remains high at PTA, which protects and stewards 38,000 acres of ungulate-free dryland forest.</p> <p>Wildland fire analysis in Section 3.3.6 has been revised. Mitigation measures the Army would consider include: (1) a multi-year research project to identify possible biological controls in the native range of <i>C. setaceus</i></p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>Leilani and other wildland fires described above. Efforts are being made by nations worldwide and their governmental agencies to protect the biodiversity of our plant and animal species. “30x30 is a worldwide initiative for governments to designate 30% of Earth’s land and ocean areas protected areas by 2030” (nature.org). As the indigenous people of this land, our responsibility is to care for all the beings that occupy space here. PTA’s operation and occupation of Ka’ohe and Humu’ula is in direct opposition of the 30x30 initiative that should be in operation in one of the most remote places in the world.</p>	<p>(fountain grass); (2) installation invertebrate surveys; (3) an ungulate impact assessment; (4) negotiation of an agreement with the State to monitor wildfires on land not retained; and (5) implementation of additional thermal technology. These mitigation measures have been added to the Mitigation Measures subsection.</p>
Kilihea Inaba		<p>PTA is classified as a conservation district under the State’s 1961 Land Use Law so a future lease agreement or purchase from the State would be unlawful since military activity on conservation land is not legal.</p>	<p>Compliance with HAR Chapter 13-5, Conservation District, has been revised and is discussed in Sections 1.4.2 and 5.3.2. Sections 1.4.2, 3.2, and 5.3.2 have also been revised to make clear that for analysis purposes, the EIS assumes BLNR would establish a special subzone in the conservation district through a rule amendment that allows for military training use.</p>
Dr. Holeka Goro Inaba		<p>Dear Jeff Overton, Welina ke aloha, I am writing to express my deep concern regarding the potential renewal of the lease for the Pohakuloa Training Area (PTA) to the US Army. Having thoroughly reviewed the Environmental Impact Statement (EIS) for this matter, I am compelled to voice my opposition to the continuation of military activities in this sensitive cultural and environmental area. The EIS highlights numerous significant environmental impacts associated with the activities at PTA. These include, but are not limited to, soil erosion, contamination of groundwater, destruction of native habitats, and disturbance of cultural and archaeological sites. Such impacts are not only detrimental to the ecological integrity of the area but also pose a direct threat to the health and well-being of the surrounding communities.</p>	<p>Please see General Response 1.</p>
Dr. Holeka Goro Inaba		<p>Furthermore, the cultural significance of Pohakuloa cannot be overstated. The area is sacred to Native Hawaiian culture and is home to numerous cultural and archaeological sites of immense importance. The continued military activities at PTA not only disrespect our host culture but also actively contribute to its degradation and destruction. As stewards of this land, we have a moral</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>obligation to protect and preserve these cultural resources for future generations. In light of the significant environmental and cultural impacts outlined in the EIS, I urge you to reject the renewal of the lease for the Pohakuloa Training Area. Instead, I implore you to explore alternative solutions that prioritize environmental conservation, cultural preservation, and the well-being of local communities. Mahalo nui, Dr. Holeka Goro Inaba Vice Chair, Hawai'i County Council District 8 (North Kona) Sincerely, Holeka Inaba Kailua-Kona, HI 96740</p>	
<p>Dr. Holeka Goro Inaba</p>		<p>One of the most alarming findings of the EIS is the contamination of groundwater with harmful substances such as depleted uranium (DU). Given the irrefutable evidence of DU contamination, it is unconscionable to consider renewing the lease and perpetuating further harm to the environment and public health.</p>	<p>Sections 3.5.4.11 and 3.5.4.12 describe the lack of mobilization of munitions constituents, including depleted uranium, within soil, groundwater, and surface water. The text notes that risk of contaminants mobilizing is not a concern as limited surface water and groundwater pathways on the State-owned land pose minor potential impact to soil and groundwater quality.</p> <p>The best available scientific data for groundwater and surface water quality was incorporated into this EIS. Section 3.9.4.6 documents the existing management measures used by the Army to protect water resources. The State Department of Health (DOH) Safe Drinking Water Branch (SDWB) monitors groundwater quality of aquifers as described in Section 3.9. The DOH SDWB has released groundwater contamination maps for Hawai'i Island that show most contamination is along the eastern coast of the island. The DOH SDWB Environmental Health Portal is available at <a href="https://eha-cloud.doh.hawaii.gov/sdwb/#!/home">https://eha-cloud.doh.hawaii.gov/sdwb/#!/home</a>.</p>
<p>Dr. Holeka Goro Inaba</p>		<p>Dear Matthew Foster, Welina ke aloha, I am writing to express my deep concern regarding the potential renewal of the lease for the Pohakuloa Training Area (PTA) to the US Army. Having thoroughly reviewed the Environmental Impact Statement (EIS) for this matter, I am compelled to voice my opposition to the continuation of military activities in this sensitive cultural and environmental area. The EIS highlights numerous significant environmental impacts associated with the activities at PTA. These include, but are not limited to, soil erosion, contamination</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>of groundwater, destruction of native habitats, and disturbance of cultural and archaeological sites. Such impacts are not only detrimental to the ecological integrity of the area but also pose a direct threat to the health and well-being of the surrounding communities.</p>	
<p>Dr. Holeka Goro Inaba</p>		<p>Furthermore, the cultural significance of Pohakuloa cannot be overstated. The area is sacred to Native Hawaiian culture and is home to numerous cultural and archaeological sites of immense importance. The continued military activities at PTA not only disrespect our host culture but also actively contribute to its degradation and destruction. As stewards of this land, we have a moral obligation to protect and preserve these cultural resources for future generations. In light of the significant environmental and cultural impacts outlined in the EIS, I urge you to reject the renewal of the lease for the Pohakuloa Training Area. Instead, I implore you to explore alternative solutions that prioritize environmental conservation, cultural preservation, and the well-being of local communities. Mahalo nui, Dr. Holeka Goro Inaba Vice Chair, Hawai'i County Council District 8 (North Kona) Sincerely, Holeka Inaba Kailua-Kona, HI 96740</p>	<p>Please see General Response 1.</p>
<p>Dr. Holeka Goro Inaba</p>		<p>One of the most alarming findings of the EIS is the contamination of groundwater with harmful substances such as depleted uranium (DU). Given the irrefutable evidence of DU contamination, it is unconscionable to consider renewing the lease and perpetuating further harm to the environment and public health.</p>	<p>Sections 3.5.4.11 and 3.5.4.12 describe the lack of mobilization of munitions constituents, including depleted uranium, within soil, groundwater, and surface water. The text notes that risk of contaminants mobilizing is not a concern as limited surface water and groundwater pathways on the State-owned land pose minor potential impact to soil and groundwater quality. The best available scientific data for groundwater and surface water quality was incorporated into this EIS. Section 3.9.4.6 documents the existing management measures used by the Army to protect water resources. The State Department of Health (DOH) Safe Drinking Water Branch (SDWB) monitors groundwater quality of aquifers as described in Section 3.9. The DOH SDWB has released groundwater contamination maps for Hawai'i Island that show most contamination is along the eastern coast of the island. The DOH SDWB Environmental Health</p>

Responses to Second Draft EIS Comments

Commenter	Submitted By	Comment	Response
BIANCA ISAKI	KAHEA: THE HAWAIIAN-ENVIRONMENTAL ALLIANCE	<p>The DEIS repeatedly describes the proposed action as a “real estate” action under which “ongoing activities would remain the same.” DEIS V.1 at 3-22, 3-222, 3-224, 3-226, 3-265. However, the DEIS also discloses thousands more flights occurring in Bradshaw airport airspace. Id. at 3-235. Although Bradshaw is located on the federal parcels, associated activities take place on the State lands. The DEIS repeatedly states the level of activity will remain the same, but does not discuss why certain Bradshaw airport activity is significantly increasing nor assess the impacts of increased activity. Compare id. at 3-237 (“PTA airspace size and configuration would remain the same under all alternatives and the No Action Alternative.”). Even if the airport remains the same size, the DEIS demonstrates there is increasing use of the airport. This increased activity may have significant impacts on GHG emissions, live fire training contamination, noise, and other environmental factors. Please provide figures for years through 2023 and reasons for thousands more military aircraft landing and passing through this area. Additionally, revise the DEIS to disclose and assess increased activity proposed on all PTA lands, including the State lands. The DEIS also does not address new impacts from “new technology with stronger weapons that ha[ve] the capability to damage the land further and also create a higher chance of pollution into the soil and water” (DEIS V.2 at 1130). The DEIS should disclose with specificity the kinds of “continued” activities and address changes, such as type and intensity of weapons used, that may have increased environmental impacts and the nature of those increased impacts.</p>	<p>Portal is available at <a href="https://eha-cloud.doh.hawaii.gov/sdwb/#!/home">https://eha-cloud.doh.hawaii.gov/sdwb/#!/home</a>.</p> <p>The airspace above PTA remains unchanged regardless of the number of aircraft takeoffs or landings at Bradshaw Army Airfield. Section 3.13.6.1 notes adverse impacts on civilian air traffic from R-3103 activation during ongoing air- and ground-based training activities.</p> <p>Table 3-35 has been updated with the most current usage of Bradshaw Army Airfield and explanatory text about discrepancies between years (e.g., scheduled military activities) has been added to the EIS.</p> <p>The EIS does not propose new training activities. All training activities have been analyzed under previous NEPA as noted in Table ES-1 and Appendix E. Continuation of ongoing activities and the associated impacts are discussed throughout Chapter 3.</p>
BIANCA ISAKI	KAHEA: THE HAWAIIAN-ENVIRONMENTAL ALLIANCE	<p>To dismiss these alternatives, the DEIS relies on the U.S. Army Corps of Engineers-Honolulu District, “Analysis of Alternatives Study: Pōhakuloa Training Area State-Owned Lands” (2017), which is nowhere included in the DEIS. The DEIS is incomplete without a thorough assessment of these alternatives. The DEIS cannot inform decision makers if the alternatives it purports to consider are not</p>	<p>Section 1.2 provides information on the strategic importance of Hawai‘i for national defense and PTA’s role. Section 1.3 describes the purpose and need of the Proposed Action (retention of State-owned land at PTA). Alternatives that meet the ongoing purpose and need were carried forward for analysis.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>included in the document. The Army cannot rely on any past publication of this 2017 document because it is not available. See U.S. Army Corps of Engineers-Honolulu District. (2017). Analysis of Alternatives Study: Pōhakuloa Training Area State-Owned Lands. Though the Army provides a link to public documents related to its PTA EIS (DEIS V.2 at PDF1878), the link is not operational: <a href="https://home.army.mil/hawaii/index.php/ptaeis/public-info">https://home.army.mil/hawaii/index.php/ptaeis/public-info</a>. We made a formal request for this document on May 7th and 15th, 2024 and have not received it as of this writing. Calling its occupation a “real estate” action, the Army only examines a scale of acreage used for live fire training. What about virtual reality training? Training in other locations? Training in diplomacy or other alternatives to live fire training? The Army says it already looked at alternatives in a 2017 document that we have had to separately request and never received. How can the EIS meaningfully examine alternatives if they aren’t even in the EIS?</p>	<p>Section 2.2.6 added and Table 2-2 revised to consider other alternatives mentioned by the public during the Second Draft EIS public review period and previously addressed in the Analysis of Alternatives Study (2017). These alternatives do not meet the purpose and need of the Proposed Action and do not meet the screening criteria; therefore, they are considered and eliminated from detailed study in the EIS.</p> <p>A link to Analysis of Alternatives Study: Pohakuloa Training Area State-Owned Lands (USACE-POH, 2017) has been added to the PTA EIS website (<a href="https://home.army.mil/hawaii/ptaeis/project-home">https://home.army.mil/hawaii/ptaeis/project-home</a>) under the "Documents" tab.</p>
<p>BIANCA ISAKI</p>	<p>KAHEA: THE HAWAIIAN-ENVIRONMENTAL ALLIANCE</p>	<p>The DEIS does not assess actions that are necessary condition precedents, parts of a larger action of military training, or commit to larger actions. The entirety of the PTA Training Area, including the portion on federal lands, is a larger action, yet actions and uses of federal lands are not disclosed and assessed. The amendment of Conservation District rules is a condition precedent to the Army's proposed land retention, but that action and its impacts are not disclosed and assessed. By proposing to retain these lands for live fire training, the Army is committing to and as a necessary condition precedent, cleaning up these lands after the Army leaves. None of these are meaningfully discussed in the DEIS. At minimum, the DEIS fails to examine cumulative and indirect impact. For instance, the DEIS asserts “State-owned land does not contain active, permanent liquid fuel storage tanks.” DEIS V.1 at 3-248. The DEIS is silent on fuel storage tanks on federal lands, which are presumably used by activities on State lands. The DEIS should consider the impacts of such activities because if such a tank were to leak, harms could very well be realized on State lands as liquid contents will</p>	<p>As discussed in Section 2.1, the Proposed Action is limited to retention of up to 22,750 acres of the State-owned land at PTA in support of continued military training. Additionally, the Proposed Action is a real estate action (i.e., administrative action) that would enable continuation of ongoing activities on the retained State-owned land. The Proposed Action does not include construction, modernization, or changes in ongoing activities in the retained State-owned land. Therefore, the EIS analyzes the potential impacts from land retention and continuation of ongoing Army activities on the State-owned land. Any changes in ongoing activities would be subject to separate NEPA analysis in the future.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		pay no mind to jurisdictional boundaries. The DEIS is replete with such incomplete disclosures.	
BIANCA ISAKI	KAHEA: THE HAWAIIAN-ENVIRONMENTAL ALLIANCE	The DEIS does not adequately disclose the proposed action because it is unclear what is being proposed. The Army's preferred alternative is Alternative 2. DEIS V.1 at 2-25. Under Alternative 2, 86 percent of land, approximately 19,700 acres, would be retained, most of which is critical habitat designated by USFWS for Palila. Id. at 2-15. However, the Army proposes to retain up to 22,750 acres of State-owned land in support of continued military training. Id. at 1.	The Proposed Action (see Section 2.1) is the retention of up to 22,750 acres of the State-owned land. Section 2.2 presents a reasonable range of action alternatives (Alternatives 1, 2, and 3) for the Proposed Action that vary in acreage from 22,750 acres (Alternative 1), approximately 19,750 acres (Alternative 2, the Preferred Alternative), and 10,100 acres (Alternative 3).
BIANCA ISAKI	KAHEA: THE HAWAIIAN-ENVIRONMENTAL ALLIANCE	The longer the Army uses these lands, the more contaminated they become. The DEIS nowhere discloses the cumulative impacts of continuing the Army's occupation. For the impact area where the live fire occurs, the Army admits it is not cleared for decades and decades "for safety reasons". See Dena Takruri, "How the Army Got to Bomb Hawai'i for \$1 a Year" AJ+ (May 17, 2022) available at: <a href="http://www.youtube.com/watch?v=-nsn4Sxy8r8">www.youtube.com/watch?v=-nsn4Sxy8r8</a> (Lt. Kevin Cronin, PTA Commander at 2:40).	Chapter 4, Cumulative Impacts, provides an analysis of the cumulative impacts of the Proposed Action and lease compliance actions with past, present, and reasonably foreseeable future actions for all resource areas.
BIANCA ISAKI	KAHEA: THE HAWAIIAN-ENVIRONMENTAL ALLIANCE	The DEIS is required to disclose potential significant impacts, including indirect and secondary impacts of a proposed action. The Army acknowledges its proposed use of State conservation district lands is nonconforming and will be unlawful as soon as the lease ends in 2029. DEIS V.1 at 5-14. The Army thus proposes to amend conservation district rules, HAR chapter 13-5. Amendment of conservation district rules is integral to the proposed action and therefore must be assessed as part of the entire action. First, the DEIS fails to disclose the proposed amendment for the conservation district rules for the Resource subzone or the consequence of proposing a new subzone. What is the proposed rule? Would other lands fall under the new subzone? Second, the DEIS would need to assess and disclose potential significant secondary impacts of the rule amendments. Where are other resource subzone Conservation District lands? How will changing the rules for all of these lands affect the environment? The DEIS is incomplete without this assessment and disclosure.	Sections 1.4.2, 3.2, and 5.3.2 have been revised to clarify the process would be a rule amendment. Sections 1.4.2, 3.2, and 5.3.2 have also been revised to make clear that for analysis purposes, the EIS assumes BLNR would establish a special subzone in the conservation district that allows for military training use. The establishment of a special subzone is not part of the Proposed Action (Army retention of State-owned land at PTA) and would be an action of the State.

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
BIANCA ISAKI	KAHEA: THE HAWAIIAN-ENVIRONMENTAL ALLIANCE	The DEIS concedes hazardous waste will be transported from PTA through Kawaihae Harbor, over the Pacific Ocean, and into areas in America. DEIS V.1 at 3-111 (“the Army would continue to truck hazardous substances and POLs from Kawaihae Harbor to PTA and to truck used POLs, used hazardous substances, and hazardous wastes from PTA to either Hilo or Kawaihae Harbor for shipping off-island to the U.S. mainland or other areas for recycling, reuse, or disposal, as necessary”). The DEIS should disclose spill and contamination risk, protocols for preventing these risks, and the hazardous nature of the materials transported and stored when they are: (1) transported from PTA; (2) brought to Kawaihae harbor; (3) travel across the ocean; and (4) are processed in America. This risk assessment should include a record of the past spills and contamination events during the Army’s tenure at PTA.	Hazardous wastes manifests can be obtained through the Freedom of Information Act process. The FOIA Library and FOIA Request process are available at: <a href="https://www.rmda.army.mil/foia/RMDA-FOIA-Division.html">https://www.rmda.army.mil/foia/RMDA-FOIA-Division.html</a> . The Proposed Action is a real estate action (i.e., administrative action) that would enable continuation of ongoing activities on the retained State-owned land. Chapter 3 of this EIS lists the regulatory environment, best management practices employed by the Army by resource area, and analyses of impacts to each resource area. The current status of range management activities regarding hazardous substances and hazardous wastes is discussed in Section 3.5.4. The Proposed Action’s consistency with regulations, land use plans, policies, and controls is provided in more depth in Section 5.3. A review of the HDOH HEER Office Environmental Health Warehouse on October 2, 2024 did not reveal any hazardous substance or hazardous waste incidents associated with the military between PTA and the Hilo or Kawaihae Harbors. PTA uses contractors to transport used hazardous substances and hazardous wastes from PTA.
BIANCA ISAKI	KAHEA: THE HAWAIIAN-ENVIRONMENTAL ALLIANCE	The DEIS fails to disclose and assess impacts of continued training at PTA on biological resources. Appendix K is the only biological “study” and it is a 5 page list of species.	Appendix K contains the supporting information for the biological resources analysis; please see Section 3.3.6. for a more detailed analysis and references to additional studies that have been completed.
BIANCA ISAKI	KAHEA: THE HAWAIIAN-ENVIRONMENTAL ALLIANCE	Between its first EIS on April 8, 2024 and the current DEIS released on April 23, 2024, the Army removed more than 700 pages of cultural impact information. The first CIA includes specific criticisms that Hawaiian cultural practitioners are concerned that resources they gather are contaminated; the Army installed physical barriers blocking religious sites; and requiring case-by-case approvals and Army escorts for practitioners curtails the latter’s access. The new CIA recommends “the Army formalize a cultural access request process...” Why not clean up these areas and allow free access?	The first draft CIA was revised to improve readability, focus analysis within the project area and broad geographical area, and add information from new survey respondents and interviews. No information provided by the interviewee and survey respondents was removed from the DEIS CIA.  Section 3.5.4.2 explains current access limitations. Mitigation measures for significant, adverse impacts on cultural practices are identified in EIS Sections 3.4.6.1, 3.4.6.2, and 3.4.6.3. Section 3.4.4.6 has been revised to clarify that outreach and engagement with cultural practitioners and NHOs is an ongoing, existing management measure.

Responses to Second Draft EIS Comments

Commenter	Submitted By	Comment	Response
BIANCA ISAKI	KAHEA: THE HAWAIIAN-ENVIRONMENTAL ALLIANCE	<p>The DEIS admits it does not include a life-cycle analysis of greenhouse gas emissions (GHG) from direct activities associated with ongoing use of the State-owned land as well as from indirect activities such as manufacturing and shipping equipment and material and troop movements to and from PTA. DEIS at 3-118. Hawaii’s environmental rules specifically require assessment of the significance of GHG emissions. Militaries are well-known for their significant contributions to GHG emissions across the world. See e.g. S. Mcfarlane and V. Volcovici, “Insight: World’s war on greenhouse gas emissions has a military blind spot” Reuters News (Jul. 10, 2023) available at: <a href="http://www.reuters.com/business/environment/worlds-war-greenhouse-gas-emissions-has-military-blind-spot-2023-07-10/">www.reuters.com/business/environment/worlds-war-greenhouse-gas-emissions-has-military-blind-spot-2023-07-10/</a>; L. Mallinder “Elephant in the Room is the U.S. Military,” Al Jazeera (Dec. 12, 2023) <a href="http://www.aljazeera.com/news/2023/12/12/elephant-in-the-room-the-us-militarys-devastating-carbon-footprint#:~:text=What%20is%20its%20impact%20on,accounts%20for%20around%202%20percent">www.aljazeera.com/news/2023/12/12/elephant-in-the-room-the-us-militarys-devastating-carbon-footprint#:~:text=What%20is%20its%20impact%20on,accounts%20for%20around%202%20percent</a>. The Army does not explain why it could not conduct a GHG emissions lifecycle analysis, which has become a regular feature of environmental review in Hawai’i and in proceedings before the Public Utilities Commission. Without any significant disclosure of GHG emissions, the DEIS renders conclusions about the localized impacts of the Army’s own GHG emissions. See e.g. DEIS V.1 at 4-13 (“Because there is limited opportunity for locally generated air pollutants to accumulate, additive effects on regional air quality and from GHGs are unlikely.</p>	<p>Section 3.6.2 explains why a quantitative, full life-cycle analysis of greenhouse gases has not been performed. Section 3.6.6 provides a qualitative analysis of the direct and indirect greenhouse gas emissions from the Proposed Action alternatives. HEPA does not require a quantitative analysis of greenhouse gas emissions.</p> <p>Text added to Section 5.2 (incomplete information/unresolved issues) to elaborate on the lack of available information to conduct a quantitative analysis of greenhouse gases and associated social costs as well as the reasons for proceeding without resolution.</p>
BIANCA ISAKI	KAHEA: THE HAWAIIAN-ENVIRONMENTAL ALLIANCE	<p>The DEIS discloses that groundwater exists at least 700 feet below the surface of PTA lands. DEIS at 3-173. Groundwater below the training area is apparently in geologically sensitive areas. At 3,000 feet below, water was approximately 120°C (248°F). Id. There is no disclosure as to the depths to which training-associated explosions may excavate the ground and allow contaminants to leak towards the aquifer. Throughout the DEIS, the Army asserts “the highly porous nature of the relatively young volcanic rocks that cover most of the</p>	<p>Please see Sections 3.5, 3.6, 3.7, and 3.11 of the EIS for information on hazardous substances and hazardous wastes, air quality, noise, and environmental justice impacts. Please also see Appendix D and Appendix M, for EIS comments and responses.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>property” in order to minimize contamination and runoff impacts. DEIS V.1 at 4-15; see also id. at 3-103, 3-174, 3-175. The DEIS, however, does not disclose, despite a pointed inquiry from the Sierra Club Moku Loa Group: “At what depth would impacts from training become significant to groundwater [?]” DEIS V.2 at 1084. Instead, the Army responds with the irrelevant assertion: “Groundwater extraction from State-owned land at PTA is not proposed or foreseen as part of the Proposed Action.” Id. at 1853. The DEIS does not assess and disclose contamination to groundwater resources. Not planning to pump water on state-owned lands at PTA is not an acceptable reason to disregard impacts to groundwater. The DEIS does not address the cultural impact of groundwater at this site. Proposed continue military activity includes the Punahou site, which overlies “sacred waterways that the Hawaiians have been holding on to for hundreds and hundreds of year[s.]” DEIS V.2 at 1071.</p>	
<p>BIANCA ISAKI</p>	<p>KAHEA: THE HAWAIIAN-ENVIRONMENTAL ALLIANCE</p>	<p>The 2d DEIS refers to HAR chapter 11-200 in several parts, but the applicable rules are in HAR chapter 11-200.1. The Second DEIS does not document and catalog the reasons that it was produced over the First DEIS, noticed on April 8, 2024. Please provide a table or appendix describing these changes to account for the erasure of over 700 pages of disclosures.</p>	<p>Appendix A of the EIS contains a table of NEPA and HEPA rules and what section of the document those rules are addressed, including HAR 11-200.1.</p> <p>Section 1.6.4 provides a discussion on why a Second Draft EIS was published. Appendix D includes responses commensurate to all agency and public comments on the Draft EIS.</p>
<p>BIANCA ISAKI</p>	<p>KAHEA: THE HAWAIIAN-ENVIRONMENTAL ALLIANCE</p>	<p>To the extent these un-cleared lands are federal lands, the DEIS fails to disclose the locations of non-cleared lands and their significant impacts on adjoining state lands.</p>	<p>Section 3.5.3 states that the region of influence for hazardous substances and hazardous wastes includes the impact area due to the firing of military munitions from the State-owned land into the impact area. Section 3.5.6 evaluates the potential impacts from continuation of ongoing activities within the State-owned land, including impacts to the impact area.</p> <p>U.S. Government-owned land not potentially impacted by the Proposed Action is not within the scope of the EIS.</p>
<p>BIANCA ISAKI</p>	<p>KAHEA: THE HAWAIIAN-ENVIRONMENTAL ALLIANCE</p>	<p>The DEIS reports uncontrolled fires that scorched thousands of acres of native habitat before they were contained. Destruction of wild native species creates opportunities for invasive species, erosion, and other,</p>	<p>PTA's management of native, protected, and invasive species is discussed in Section 3.3.4. Section 3.3.4 and Appendix K have been updated with more recent scientific data and surveys and wildland fire analysis in</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>slower means of irrevocably changing the native landscape. The DEIS describes fire management and reporting but adequate plans for fire are an issue. The PTA fire crew is not really equipped to handle wild land fires. Fires have scorched hundreds of acres in this windy area..</p>	<p>Section 3.3.6 has been revised. Mitigation measures the Army would consider include: (1) a multi-year research project to identify possible biological controls in the native range of <i>C. setaceus</i> (fountain grass); (2) installation invertebrate surveys; (3) an ungulate impact assessment; (4) negotiation of an agreement with the State to monitor wildfires on land not retained; and (5) implementation of additional thermal technology. These mitigation measures have been added to the Mitigation Measures subsection. In accordance with DoD Instruction 6055.06, DoD Fire and Emergency Services Program, and the PTA Integrated Wildland Fire Management Plan, PTA firefighters respond to all fires on PTA lands and within the Army's Area of Responsibility. Per the Memorandum of Agreement between the Army and the Hawai'i County Fire Department, signed December 22, 2014, the Army is the primary responder to all fires within the PTA Area of Responsibility, which includes all areas within 25 road miles from the PTA boundary. PTA personnel implement procedures for prevention and suppression of all fires, including wildfires, in accordance with the Integrated Wildland Fire Management Plan.</p>
<p>BIANCA ISAKI</p>	<p>KAHEA: THE HAWAIIAN-ENVIRONMENTAL ALLIANCE</p>	<p>Most importantly, the DEIS does not disclose added impacts of continued contamination of the lands, rather electing to include clean up and restoration activities in their calculation - such that the cumulative impact of just utilizing the lands is never disclosed. See DEIS V.1 at 4-2 ("For most resources, the impacts of past actions are now part of existing conditions.</p>	<p>Lease compliance actions are analyzed with the Proposed Action as a single action per HAR Section 11-200.1-10. The cleanup and restoration activities for State-owned land not retained would be conducted after expiration of the current lease and, therefore, are not part of the Proposed Action.</p> <p>Section 4.1 revised to state that past actions are actions from the beginning of military activity at PTA to the present time and are captured in the existing conditions analysis of each resource area.</p>
<p>BIANCA ISAKI</p>	<p>KAHEA: THE HAWAIIAN-ENVIRONMENTAL ALLIANCE</p>	<p>Though the Army asserts "soldiers are required to collect casings from spent rounds, wood boxes, and other solid waste debris generated during live-fire training and return them to the ammunition holding area and ammunition supply point for recycling or disposal, as appropriate" (DEIS V.2 at 1858), it is unclear whether this practice required for all areas of PTA, the level of compliance by</p>	<p>As noted in Section 3.5.4.11, the Pohakuloa Training Area Range Operations Standard Operating Procedures and the USAG-PTA External Standard Operating Procedures contain requirements for range operations, maintenance, and range management activities, which are applicable to all ranges on PTA. Range Operations personnel oversee the range management activities when the soldiers have</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>soldiers, and how compliance is regulated and ensured. For instance, are soldiers required to collect as many rounds as they have expended? However, the DEIS does not disclose the extent to which these lands cannot be cleaned up .</p>	<p>completed their training. Sections 3.5 and 3.15 include relevant information from the Pohakuloa Training Area Range Operations Standard Operating Procedures and the USAG-PTA External Standard Operating Procedures regarding cleaning ranges after training.</p> <p>Section 3.5.6 describes the cleanup activities to be performed on any State-owned land not retained.</p>
<p>BIANCA ISAKI</p>	<p>KAHEA: THE HAWAIIAN-ENVIRONMENTAL ALLIANCE</p>	<p>Additionally, the Proposed Action, including connected actions, would start in 2029 but not end until all lease compliance actions have been completed and all cleanup and restoration activities have met regulatory standards. Consequently, the timeframe for potential cumulative impact contributions from present and reasonably foreseeable future actions addressed in this analysis begins in the present and has no defined end date.”).That is, by presuming back-end “cleanup and restoration” will occur later , the DEIS elides disclosure of significant munitions pollution and impacts during the duration of proposed land retention. These should be disaggregated for reasons including the Army may not be able to clean up or restore these lands .</p>	<p>Lease compliance actions are analyzed with the Proposed Action as a single action per HAR Section 11-200.1-10. The cleanup and restoration activities for State-owned land not retained would be conducted after expiration of the current lease and, therefore, are not part of the Proposed Action.</p> <p>Section 4.1 revised to state that past actions are actions from the beginning of military activity at PTA to the present time and are captured in the existing conditions analysis of each resource area.</p>
<p>BIANCA ISAKI</p>	<p>KAHEA: THE HAWAIIAN-ENVIRONMENTAL ALLIANCE</p>	<p>The DEIS is required to consider actions of a significantly different nature that would provide similar benefits with different environmental impacts, including alternative locations for the proposed action and alternatives that are not within the existing authority of the agency. The DEIS does not provide meaningful consideration of alternatives including: 1. alternatives to live fire training, such as synthetic virtual reality simulations 2. reduced need for live fire training in light of modernized warfare methods, 3. changed nature of engaged combat (i.e., metropolitan settings as opposed to the undeveloped terrain at PTA) 4. geographical alternatives for training areas in america/ other INDOPAC countries. 5. demilitarization/ diplomatic alternatives to live fire combat (i.e., peacemaking).</p>	<p>Section 1.2 provides information on the strategic importance of Hawai’i for national defense and PTA’s role. Section 1.3 describes the purpose and need of the Proposed Action. Alternatives that meet the ongoing purpose and need were carried forward for analysis in the EIS. Locations outside of the State-owned land at PTA and alternative training scenarios (e.g., computer-based simulation training) do not address the purpose and need of the Proposed Action, do not meet the screening criteria, and were previously considered (see Sections 1.1.3 and 2.2.6). Therefore, they are not considered alternatives for the the Proposed Action and are not analyzed in the EIS. A link to Analysis of Alternatives Study: Pohakuloa Training Area State-Owned Lands (USACE-POH, 2017) has been added to the PTA EIS website (<a href="https://home.army.mil/hawaii/ptaeis/project-home">https://home.army.mil/hawaii/ptaeis/project-home</a>) under the "Documents" tab.</p>

**Responses to Second Draft EIS Comments**

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BIANCA ISAKI	KAHEA: THE HAWAIIAN-ENVIRONMENTAL ALLIANCE	<p>The DEIS assumes the status quo will continue under its proposed action. DEIS V.3 at H-1 (“If the Army were to retain the State-owned land via lease, then it is assumed the Army would be held to a new lease that contains the same or very similar conditions as the existing lease and the addition of assumed Army obligations based on State requirements in the [Court Ordered Management Plan.]”).</p> <p>The 1964 lease requires: “Weapons and shells used in connection with training activities are to be removed to the extent that technical and economic capability exists and provided that expenditure for removal would not exceed the fair market value of the land.” DEIS V.1 at 3-14.</p> <p>The DEIS fails to disclose existing technical and economic capability that may limit removal of contamination. The DEIS nowhere discloses the fair market value of the land. The DEIS admits the Army does not know the extent of the contamination.</p>	<p>Section 3.5.6 describes the cleanup activities to be performed on any State-owned land not retained. In accordance with the lease and under the provisions of existing law, the Army retains responsibility for cleanup of closed ranges (i.e., State-owned land not retained). After the lease expires, the Army would follow federal law and regulations to determine how and when cleanup and restoration activities for hazardous substances and MEC within the State-owned land not retained would occur under the CERCLA process.</p> <p>Section 5.2.4 revised with text regarding uncertainties associated with technical and economic capabilities for future cleanup. The cleanup would be accomplished within technical and economic capabilities and is subject to several items such as negotiation with the State, regulation changes (e.g., future regulatory requirements), and future cleanup processes and costs.</p> <p>The fair market value of the land would be determined following completion of the NEPA/HEPA process.</p> <p>Section 3.5.4 provides information regarding the extent of hazardous substances and hazardous wastes within the region of influence.</p>
BIANCA ISAKI	KAHEA: THE HAWAIIAN-ENVIRONMENTAL ALLIANCE	<p>The Army does not deny "six species of endemic birds have been extirpated from the area" during the time that the Army has been using these lands. DEIS V.2 at 1932.</p> <p>The DEIS must disclose and assess the impact of the proposed action, added to other past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes the other actions</p>	<p>The cumulative impacts analysis in Chapter 4 includes past, present, and reasonably foreseeable future actions beyond just those at PTA (see Table 4-1).</p> <p>Section 4.1 revised to state that past actions are actions from the beginning of military activity at PTA to the present time and are captured in the existing conditions analysis of each resource area.</p>
BIANCA ISAKI	KAHEA: THE HAWAIIAN-ENVIRONMENTAL ALLIANCE	<p>The 2023 Integrated Resource Management Plan for PTA lists 4 endangered bird species, 14 protected bird species as the inventory of bird species from 2006-2016. See U.S. Army, “Integrated Natural Resources Management Plan” (Oct. 23, 2020)  <a href="https://home.army.mil/hawaii/application/files/1016/0383/6646/PTA_INRMP_2019-">https://home.army.mil/hawaii/application/files/1016/0383/6646/PTA_INRMP_2019-</a></p>	<p>The comprehensive list of species documented on PTA can be found in Appendix K, and the birds listed in this section are known to be in existence and can be found and utilize PTA habitat or fly over. Discussion and analysis of native and protected species can be found in Section 3.3.4 These sections have been updated with more recent scientific data and surveys and wildland fire</p>

Responses to Second Draft EIS Comments

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		<p>2023_FINAL_signed_2020_10_23.pdf. The DEIS does not disclose whether all but two of these species have been extirpated, only that the Army is aware of two protected bird species. That is, the DEIS recites management measures from their 2003, 2008 and 2013 Biological Opinions. These management measures are not working.</p>	<p>analysis in Section 3.3.6 has been revised.</p> <p>Mitigation measures the Army proposes include: (1) a multi-year research project to identify possible biological controls in the native range of <i>C. setaceus</i> (fountain grass); (2) installation invertebrate surveys; (3) an ungulate impact assessment; (4) negotiation of an agreement with the State to monitor wildfires on land not retained; and (5) implementation of additional thermal technology. These mitigation measures have been added to the Mitigation Measures subsection.</p>
<p>BIANCA ISAKI</p>	<p>KAHEA: THE HAWAIIAN-ENVIRONMENTAL ALLIANCE</p>	<p>The DEIS does not assess the increased wildfire risk in light of increased drought and with other climate change impacts on wildlife and listed species. These “wildfires” are consequent to the Army’ activities on federal lands . Id. at 3-262 (“Most wildfires at PTA occur on live-fire ranges on the eastern and northern perimeters of the impact area on U.S. Government-owned land. The majority of fires recorded on PTA are ignited from military activities.”).</p>	<p>In accordance with DoD Instruction 6055.06, DoD Fire and Emergency Services Program, and the PTA Integrated Wildland Fire Management Plan, PTA personnel implement procedures for prevention and suppression of wildland fires. This includes maintaining firebreaks and fuel breaks, which prevent fire from spreading. Within PTA, the roads within Training Areas 17-22 serve as firebreaks to prevent the spread of fire towards the west. DKI Highway and Mamalahoa Highway serve as firebreaks that prevent fire from spreading to Waiki’i Ranch and Waikoloa Village. Mitigation measures the Army proposes include (1) negotiation of an agreement with the State to monitor wildfires on land not retained and (2) implementation of additional thermal technology. These mitigation measures have been added to the Mitigation Measures subsection.</p>
<p>BIANCA ISAKI</p>	<p>KAHEA: THE HAWAIIAN-ENVIRONMENTAL ALLIANCE</p>	<p>The DEIS does not disclose nor assess the extent to which these measures are failing and therefore does not disclose significant impacts. Amongst other things, the DEIS does not make logical connections between military activity-generated fires, climate change, and noise levels with ongoing impacts to wildlife and listed species. In July 2018, a wildfire burned 1,445 acres of Training Areas 18, 19, and 22, which resulted in thousands of dead ‘ōhi‘a ( <i>Metrosideros polymorpha</i> ), naio ( <i>Myoporum sandwicense</i> ), māmane ( <i>Sophora chrysophylla</i> ), ‘a‘ali‘i ( <i>Dodonaea viscosa</i> ), and other plants. DEIS V.2 at 1659; DEIS V.1 at 3-33. Endangered ope`ape`a bat habitat was burned in fires as well. DEIS V.1 at 3-51.</p>	<p>Section 3.3.4 has been updated with more recent scientific data and surveys. Wildland fire analysis in Section 3.3.6 has been revised.</p> <p>Mitigation measures the Army would consider include: (1) a multi-year research project to identify possible biological controls in the native range of <i>C. setaceus</i> (fountain grass); (2) installation invertebrate surveys; (3) an ungulate impact assessment; (4) negotiation of an agreement with the State to monitor wildfires on land not retained; and (5) implementation of additional thermal technology. These mitigation measures have been added to the Mitigation Measures subsection.</p>

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BIANCA ISAKI	KAHEA: THE HAWAIIAN-ENVIRONMENTAL ALLIANCE	Consequently, the action alternatives, when combined with past, present, and reasonably foreseeable future actions, would result in less than significant cumulative impacts on air quality and from GHGs under lease and fee simple title.”). This fundamentally misunderstands how climate change operates and does not meet the purpose of an environmental disclosure document. The DEIS demonstrates it is premised on an incorrect understanding of climate change, stating: “Analyzing the effects of climate change from a worldwide perspective is not a reasonable methodology because the effects differ by locality.” DEIS V.2 at 1852.	Section 3.6.3 summarizes and provides the justification for the region of influence for climate change impacts.
BIANCA ISAKI	KAHEA: THE HAWAIIAN-ENVIRONMENTAL ALLIANCE	The DEIS measures “noise” in terms of “complaint risk”, but does not assess the impacts on wildlife, which cannot complain. DEIS v.1 at 3-135, Table 19. This is significant because the DEIS only relies on studies such as of the monarch flycatcher to conclude,, “birds and other wildlife have been documented as becoming habituated to aircraft overflights and other noises (e.g., artillery training) after continuous or frequent exposure” and “Therefore, most wildlife in the vicinity are expected to be habituated to noise associated with training activities.” Id. at 3-137. This conclusion is not warranted and does not describe whether habituating wildlife to loud, sudden noises has significant impacts on their ability to navigate their ecosystems otherwise. The National Park Service (NPS) maintains a database of research on the ways chronic stressors, including noise, can significantly impact wildlife. NPS Annotated Bibliography “Impacts of Noise on Wildlife,” <a href="http://www.nhsec.nh.gov/projects/2014-04/documents/150420pastoriza.pdf">www.nhsec.nh.gov/projects/2014-04/documents/150420pastoriza.pdf</a> . Chronic noise can change their interactions and alter communities. A. Mok, et. al, “How chronic anthropogenic noise can affect wildlife communities,” <i>Frontiers Eco. Ecol.</i> (Apr. 5, 2023) <a href="http://www.frontiersin.org/articles/10.3389/fevo.2023.1130075/full">www.frontiersin.org/articles/10.3389/fevo.2023.1130075/full</a> . The DEIS is required to disclose potential significant adverse effects, not recite hopeful scenarios. The DEIS discloses dust generation “is a problem at [Firing Points] where vegetative cover is less than 12 percent” but does not disclose nor assess how dust impacts wildlife and plant	Additional wildlife and noise study information has been added to Sections 3.3.4.4, 3.3.6, 3.7.4, and 3.7.6. Dust is discussed in Section 3.6.

**Responses to Second Draft EIS Comments**

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		<p>communities. DEIS V.1 at 3-158. These areas don't just happen to be without vegetation, also lacking is an analysis of how Army activities have contributed to the denuding of land so that vegetative cover is less than 12 percent.</p>	
<p>BIANCA ISAKI</p>	<p>KAHEA: THE HAWAIIAN-ENVIRONMENTAL ALLIANCE</p>	<p>The DEIS also fails to consider cumulative impacts of the proposed action on GHG emissions and air pollution. Under Alternative 1 "GHG emissions would continue to be emitted from direct activities on the State-owned land retained such as exhaust from military vehicles, aircraft flight operations, and the internal combustion engine at Building 601, and military munitions use." DEIS V.1 at 4-13. GHGs that continue to be emitted have a cumulative effect over time. Without meaningful analysis of the action's GHG emissions, the DEIS does not disclose significant impacts, nor whether measures such as using "more than 450 solar panels at 16 small arms ranges" mitigate those impacts. DEIS V.1 at 3-121.</p>	<p>Section 4.4, Air Quality and Greenhouse Gases, revised to clarify the potential climate change impacts analyzed in Section 3.6.</p> <p>Text regarding the solar panels added to Section 4.4, Air Quality and Greenhouse Gases, Impacts of Past PTA Activities.</p>
<p>BIANCA ISAKI</p>	<p>KAHEA: THE HAWAIIAN-ENVIRONMENTAL ALLIANCE</p>	<p>DEIS V.1 at 2-3 ("Future cleanup and restoration activities would be completed in accordance with applicable future requirements, which are not known and may include emerging contaminants that become known in the future."). The DEIS cannot meaningfully disclose the significance of impacts of land retention without disclosing the irrevocable contamination of these lands and its resources.</p>	<p>Section 3.5.6 fully discusses the potential impacts of the Proposed Action, lease compliance actions, and cleanup and restoration activities for known hazardous substances and hazardous wastes under current environmental regulations.</p> <p>Section 2.1 revised to clarify that the cleanup and restoration activities for State-owned land not retained would be triggered by and conducted after expiration of the current lease and therefore are not part of the Proposed Action. These activities would be completed in accordance with applicable future cleanup and restoration requirements and standard processes (i.e., requirements and standard processes at the time those activities are initiated). These future cleanup and restoration requirements, standard processes, and associated costs are not known. The Army will coordinate its cleanup actions with the State of Hawai'i throughout the CERCLA process.</p>
<p>Robert James IV</p>		<p>Additionally during some training activities there are low fly overs near the village, resulting in irritating noise pollution.</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

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Robert James IV		<p>The traffic that is associated with the training area is a real impact on the residents of Waikoloa Village. The training area adds lots of convoy traffic most months that result in damage to Waikoloa road as well as slowing traffic. To fix the traffic issue we need a new road to connect the training area with the Queen highway.</p>	<p>The most updated available information regarding road conditions is included in Section 3.12.4. Table 3-34 shows Waikōloa Road operates at a Level of Service of C or higher, which is acceptable for a rural roadway. Section 3.12.4 also addresses convoy traffic management measures. Construction of new roads is beyond the scope of this EIS.</p>
Mariko Jackson		<p>To whom it may concern: I want to express my strong disagreement with the Army keeping control over the lands at Pōhakuloa. I believe the best option is the "No Action Alternative." This means the Army's lease would end as planned, and they would have to clean up the area, which is part of their agreement. Many of us here are worried about what the Army's presence and activities are doing to our islands. It's important that your environmental review listens to these concerns and the advice from experts and the community who is here. Hawaii'i is not just a "resource" for you, it is a place that holds significant cultural and historical significance that is far more important than its location and space. There has been a lot of damage done already and many things that have already happened cannot be undone. Don't continue exacerbating the problem. Here are some alternatives I think you should consider adding to your study: Instead of preparing for combat, try solving problems through discussions and legal ways. This could reduce the need for military exercises here. Focus more on making sure our communities can feed themselves and recover from troubles on their own. This would help protect Hawaii'i more effectively than military actions. Only keep the lands if you're making sure they're well taken care of during the switch to being managed by local groups or a public land trust. This should help solve any legal issues about who is responsible for the land. Also, it's time to rethink the use of live fire training. Your draft report shows that you haven't looked at new methods since 2017. Please talk to us about how to clean up the lands and return them to people who love and care for them. Thank you for considering these points. Sincerely, Mariko Jackson Sincerely, Mariko Jackson Hauula, HI 96717</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

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Noelani Jai		<p>POHAKULOA TRAINING AREA</p> <p>As a Native Hawaiian, aloha 'aina (love for the land) is a core value that is intricately tied to our social and emotional well-being. "Malama pono" (care for the land) is also foundational to our people. With all due respect, the Army has not cared for the 'aina or loved it. The 'aina has been subservient to the military rather than the reverse. With the housing shortage here in Hawai'i, it's even more important than ever to return the land to our host people group. Mahalo for considering this.</p>	Please see General Response 1.
Austin Johnsen		I am listed on the DDHL waiting for my opportunity to lease agricultural land. This land should be leased to those like me waiting for an opportunity to grow Hawaii's economy and feed their community.	Please see General Response 1.
Austin Johnsen		As a Native Hawaiian I oppose Pohakuloa Training Area in it's full entirety. If you drive on saddle road you will see all the wildlife fleeing from the area because of the recent activity. The amount of sheep that have been hit on the side of the road is a great indicator of how the mismanagement of the land there. The public's safety is not held in high regard to the management of this land.	Sections 3.2.4.2 and 3.3.4.2 have been updated with additional information on public hunting and PTA game management. In compliance with the 2022 PTA hunting policy and iSportsman management, and pending training compatibility, the Army permits public hunting on PTA on weekends and national holidays. The Army has conservation law enforcement officers and game management support that work to control ungulates at PTA and support the hunting program. The Army would consider an ungulate impact assessment as a mitigation measure. Management of wild ungulates outside of the PTA boundary is beyond the scope of this EIS.
Austin Johnsen		<p>Aloha my name is Austin Johnsen. I am here giving comments in opposition of further land retention at Pohakuloa Training Area. I've submitted written testimony, and this is my oral testimony on May 6th, 2024. The current way that Pohakuloa is training is not providing satisfactory safety. There is numerous sheep running out of the training area because of the high amount of activity that people are hitting on Saddle Road. This happens daily now. I haven't seen so much deer on the side, sorry so much sheep, on the side of the road in years. Also, that is the current bombing and the chemicals that are being used on the site. I suggest that the site be returned to the Department of Hawaiian Homelands so that that area before it's completely gone to waste might be able to</p>	<p>Sections 3.2.4.2 and 3.3.4.2 have been updated with additional information on public hunting and PTA game management. In compliance with the 2022 PTA hunting policy and iSportsman management, and pending training compatibility, the Army permits public hunting on PTA on weekends and national holidays.</p> <p>The Army has conservation law enforcement officers and game management support that work to control ungulates at PTA and support the hunting program. The Army would consider an ungulate impact assessment as a mitigation measure.</p>

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		<p>provide agriculture for the State of Hawai'i. I know that there are many bases that get closed in mainland, the 48 states. I know the US Army finds that this place is special, and it is special, but this is not the place where the battle is going to happen. It could be simulated somewhere else. There is huge, vast ranches that people would love to go ahead and have the Army go over there. And for whatever they want. It doesn't need to be here. I'm available for any questions. Once again, my name is Austin Jonathan, testifying here as a private individual. Thank you.</p>	<p>Management of wild ungulates outside of the PTA boundary is beyond the scope of this EIS.</p>
Austin Johnsen		<p>I urge the United States Army to search for another training ground. The contiguous United States closes bases every year, shriveling the communities around them. Please consider closing Pohakuloa and invest in the communities that welcome you on the continent.</p>	<p>Locations outside of the State-owned land at PTA and alternative training scenarios (e.g., computer-based simulation training) do not address the purpose and need of the Proposed Action, do not meet the screening criteria, and were previously considered (see Sections 1.1.3 and 2.2.6).</p>
Jeannine Johnson		<p>Aloha mai kakou, My name is Jeannine Johnson and although I live on O'ahu, my ancestors were lawai'a (fishermen and women) and kālai wa'a (canoe-builders) from Kapāilua (South Kona) since 1777. My father was a lawai'a from Miloli'i and I spent many summers growing up there. My 'ohana still lives a life deeply connected to the land and sea and we believe in protecting our wai, kai, sky and 'āina as well as our natural, cultural and historic resources. From bombing Kahoolawe and dumping chemical munitions in the sea and poisoning thousands of people after jet fuel was leaked into Pearl Harbor's drinking water, all branches of the U.S. military have endangered Hawaii's fragile environment and resources. The Army has had 65 years to show us what kind of stewards they are to our cherished 'āina but has failed miserably and even admits it does not know the extent of its own contamination. There should be no more leases on seized Hawaiian crown lands to any branch of the US military. And if you think I don't care about military readiness, you would be wrong because my oldest son was deployed 8 times to Afghanistan and currently works for the DOD. Therefore, I know that the military has many other places on the continent to exercise and train. Mahalo. Sincerely, Jeannine Johnson</p>	<p>Please see General Response 1.</p>

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Jeannine Johnson		<p>Dear Jeff Overton, Aloha mai kakou, My name is Jeannine Johnson and although I live on O’ahu, my ancestors were lawai’a (fishermen and women) and kālai wa’a (canoe-builders) from Kapāilua (South Kona) since 1777. My father was a lawai’a from Miloli’i and I spent many summers growing up there. My ‘ohana still lives a life deeply connected to the land and sea and we believe in protecting our wai, kai, sky and ‘āina as well as our natural, cultural and historic resources. From bombing Kahoolawe and dumping chemical munitions in the sea and poisoning thousands of people after jet fuel was leaked into Pearl Harbor’s drinking water, all branches of the U.S. military have endangered Hawaii’s fragile environment and resources. The Army has had 65 years to show us what kind of stewards they are to our cherished ‘āina but has failed miserably and even admits it does not know the extent of its own contamination. There should be no more leases on seized Hawaiian crown lands to any branch of the US military. And if you think I don’t care about military readiness, you would be wrong because my oldest son was deployed 8 times to Afghanistan and currently works for the DOD. Therefore, I know that the military has many other places on the continent to exercise and train. Mahalo. Sincerely, Jeannine Johnson Honolulu, HI 96821</p>	Please see General Response 1.
Ryan Jones		<p>My name is Ryan Jones. I am Kamaaina of the Big Island. This is my 20th year living here and owning a local business. I strongly feel that Pohakuloa should be shut down entirely and removed. My home is 30.7 miles from the Pohakuloa Entrance Gate. I drive over Saddle Road 2-3 times a week or more. I have driven over Saddle Road many times and seen things which are upsetting, shocking, threatening and even straight up scary. Multiple times I have witnessed full on battles where there were drones in the air firing and tanks firing back at them. They are basically 'practicing' warfare. One time many years ago I stopped my car on the side of Saddle Road and stood on the roof of my car trying to figure out what was going on. I thought that World War 3 had started right here on our Island. After I was there a short time a military jeep with a</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

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		<p>mounted gun and a man standing at it in the rear of the jeep came and very rudely and in an extremely intimidating way told me to "get the fuck out of here."                      (Their exact words) I nearly peed my pants I was so scared! This is not acceptable! Do we live in an uncivilized, 3rd world country? Is the military allowed to intimidate, threaten, scream and curse at civilians? I was on public property, on the side of one of the busiest roads on the Island.</p> <p>This is not even to mention the noise, pollution, unexploded ammunition that is lost or left and then found, the denial of general peace, destruction of our Aina. This is all unsafe! People live here! That is the center of our Island! That is one of the most travelled roads on the Island! I would like to feel that I live here in peace but that is just not the truth when there are bombs going off literally 30 miles from my home!! I live here with my wife and our two small children. My oldest child goes to school across the street from my home. There is an elementary school 30 miles from Pohakuloa!! How is that even acceptable?</p> <p>I feel that (unknown to the general public) there is classified (except to higher up military officials) testing and development of weapons, training of such weapons, storage of weapons, possibly even imprisonment of war criminals. I know there is a lot more that goes on there that the public does not know about. As someone living so close this is scary to me. The mere existence of Pohakuloa also could make us (this Island) a target should some kind of international war begin. I have lived here long enough to see the Saddle Road development. I remember when it used to be basically a gravel road with only one paved lane down the center. I remember that the road used to run an entirely different way around Pohakuloa. You used to be able to see down into part of it. When they developed the road, this changed and they rerouted the road around the other side. You could see at one point, the mountain they have fortified. It is like a hollowed out 'super base.' I know</p>	

**Responses to Second Draft EIS Comments**

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		<p>personally people who have worked there and have been told that it goes down into the earth, there are 12-15 or more stories going down into the mountain.</p> <p>Basically, who knows what is there or what goes on there. As a resident of this island this has me greatly concerned. Is this safe? I do not think so!! Do we live here in peace? Again, I do not think so! It is just an illusion or facade. Just look at the missile scare from January 13, 2018. I was actually at the Hilo Airport - Hawaiian Airlines Ticket Desk talking to the agent when the text came in. I had a flight to Oahu that day and was checking in. Do I believe it was an accident? NO!! Do I believe the government covered it up? YES!! Do I believe the military was involved? YES!! For 45 minutes people were running around literally like it was the last minutes of their lives. I am a childhood trauma survivor and the '2018 Hawaii false missile alert' created a great deal of trauma for me. Even to this day.</p> <p>I do not see how the military is allowed to 'lease' the land when they do not even 'lease' it. From my understanding it is 'given' to them for the sum of \$1 per year!! This is outrageous!! The damage being done to our island home is severe! How can you not see that?</p> <p>I noticed just yesterday that they are expanding Pohakuloa greatly. They are making a new base, that is much farther west... It extends out to near the turn off for Upper Waikii, They have put in a new large structure and there are tons of army vehicles. It is not right. In addition, in the last few years they have rebuilt many of the structures by replacing most of them. The bunkers are all rebuilt, the whole 'war field' where they practice war has been expanded, they made new fences, barriers where you cannot see parts of it, it is upsetting and shocking!! It is like they can just do whatever the hell they want up there and nobody even cares!! Pohakuloa needs to be shut down! The RIMPAC training they do there also need to be stopped! It damages this island as well as the ocean, it disrupts and disturbs residents here and ruins the sense of</p>	

**Responses to Second Draft EIS Comments**

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		<p>'peace'. How is this acceptable?</p> <p>I feel that they should entirely close Pohakuloa, and the military should be forced to clean up the land and restore it to its original state (as much as possible) before giving it back to the Hawaiian People and people of these lands. Cleaning it up entirely may not even be possible at this point. They have essentially bombed the hell out of it!! More than likely, it is not safe to even breathe the air or walk the ground in certain parts. I feel like much of the damage done could very well be permanent.</p> <p>How long is the Military going to be allowed to destroy our Aina? How long will they be allowed to create civil unrest here in Hawaii Nei?</p>	
Michael Jones		<p>I submitted comments on the PTA 2022 DEIS by email on 18 May 2022 by email on 31 May 2022 by email on 7 June 2022. Because of illness and inability to search the DEIS documents online I have not been able to find responses to my comments.</p>	<p>Appendix D of the EIS contains all comments received and responses. The EIS conforms with Section 508 of the Rehabilitation Act of 1973, which requires agencies to make their electronic information accessible to people with disabilities.</p>
James Howe Jr.		<p>Military training and readiness is a National priority and the State of Hawai'i has historically and continues to support this effort.</p> <p>The State of Hawaii has a responsibility, via its Constitution, to provide for the welfare of its people and the resources which support the people of the State.</p> <p>This is a simplistic overview but keenly highlights the current issue of competing legal priorities over Lands held in fee simple by the State of Hawai'i and the objectives and priorities of the U.S. Army which deprive the residents of the State use of their lands.</p> <p>The need for compromise in this situation would appear to be paramount.</p> <p>There is sufficient time to negotiate a solution prior to the expiration of the current lease between the State of Hawai'i and the U.S. Army, for its use of the subject land</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

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		<p>parcel. If they have not already been undertaken, negotiations should commence to identify properties that are under Federal jurisdiction that could be conveyed to the State of Hawai'i in consideration for the conveyance of the Pahakulao lands from the State of Hawai'i to the U.S. Army.</p> <p>In particular, I recommend the lands currently under U.S. Army jurisdiction in Waikiki, specifically U.S. Army Garrison lands known as Fort DeRussy, should be considered for transaction. These lands do not serve any direct military training or readiness function. The lands that are known as Bellow's Air Station should also be considered. It is noted in the draft EIS that the USMC utilizes the Pahukuloa Training site extensively, only second to the U.S. Army. The Bellow's Air Field lands are used periodically for military training and readiness exercises but are primarily used for recreational purposes.</p> <p>Thank you for the opportunity to comment.</p>	
Joe Woo Jr.		<p>NO to lease extensions, NO to ongoing military training?, NO land swaps, YES to restoration and clean up of Pohakuloa, and YES to reparations to Hawaiians for destroying their lands.</p>	<p>Please see General Response 1.</p>
Juju		<p>Aloha, My name is Juju. I have just one name. I've been living in Naalehu, on the Big Island for the past 30 years. I am horrified by the bombing that has taken place and continues to take place on the CONSERVATION lands in PTA! There are important biological and cultural resources here. It is not okay to trash CONSERVATION lands with military bombs, chemicals, and training! And since the military has lied so much about so many things, including the toxins it leaves behind (red hill, uranium, illegal white phosphorus bombs dropped by Israel during Rimpac games, etc.), and the fires it creates (burning up Hawaiian homelands)--we know the military cannot be trusted. Therefore, it is of utmost importance that a 3rd</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>party be hired to do an EIS on the 132,000 acres occupied. Furthermore, the military is obligated to clean up its toxic mess and work to restore the lands it has ruined. Millions of dollars are allocated annually for clean up and restoration. The people want to see this money being used accordingly. We want to see the military maximize (not minimize!) its cleaning and restoration efforts. The military should never have been able to purchase a lease on this land in the first place. It is an illegal lease. Do the right thing by ending the current lease on the 23,000 acres and do not allow a retention option! No land swaps! No buffer zones! Shut down PTA! The land must go back to its rightful owners, the people from whom it was stolen, the people who cared for it beautifully, kept it pristine, and supportive of LIFE-- the Kanaka Maoli. It would be a biological and psychological assault on me and everyone I know living in Hawaii to extend another lease to the US military--a war machine that turns land into deserts of toxic DEATH! Mahalo for reading.</p>	
Kelina Kaaihue		<p>My name is Kelina Kaaihue. I come from my Mai'eahu, Maui. And I'd just like to share my mana'o today and paint you a picture, actually. When I was four years old, I went to the State House on Maui and I was -- I was testifying against rebuilding and building the telescopes on Haleakala. When I was 10 years old, I went back -- I went back to the State House and I testified for water rights. When I was 11, I did it again. When I was 12, I went back to the State House testifying for building telescopes on Mauna Kea. When I was 13, one more time. 14, one more time. When I was 17 years old, I wrote a letter to Congress telling them my mana'o, how ikaika I was standing forth for my lāhui, for my 'āina, for my water, for my mauna. When I was 18 years old, 19 years old -- I just took a trip to Kaho'olawe, and let me tell you, if my mo'opuna have to go there and see the 'eha, the 'eha of the 'āina, the 'eha of the kānaka, the 'eha of the lāhui, I hope that never ever has to happen. Because here now, 20 years old, I'm here again, testifying again, talking again. How much times do I got to talk for someone to hear me? You know what I</p>	Please see General Response 1.

Responses to Second Draft EIS Comments

Commenter	Submitted By	Comment	Response
		<p>mean? And I hope to God, I pray to Ke Akua my mo'opuna will never ever have to go through this. How much time has my kupuna went up there, chained himself to a pohaku? For what? Just for you to blow it up. Not -- not to you directly, I'm sorry, but to your bosses, to your people, to the military. I have no -- no disrespect towards the military. My papa was a veteran. He fought in the Vietnam War, very, very proud of where he came from. Very, very proud of the -- the battles that he fought. My tutu goes to the -- to the base, buys her Turkey 50 percent off every Thanksgiving. No shame. But what the military is lacking, I think, is the concept of aloha 'āina. The concept of mālama kānaka, mālama lāhui. You know, I -- I don't want my mo'opuna to be in this world not knowing what it means to -- to be kānaka, to be on this 'āina and not know the love for the land. And I really do think that if the -- the military, the people in power really sit and listen, listen to what we have to say, listen to the mana'o that is brought up, you know, that it'll really, really make a change. I mean, all these people are here today, kupuna, kupuna, sorry, not -- not saying that you guys are old, but just -- just kupuna, you know what I mean? And I bet your kupuna was fighting too and -- and you was here as a little boy, like, oh man. And I just think -- and I'm so happy that everyone is here sharing their mana'o and mahalo for your time today. Malama Pohakuloa. Malama 'āina. Aloha 'āina. Aloha Lāhui. Mahalo nui.</p>	
<p>Nawahine Kahoopii</p>		<p>I am a personal friend of Auntie Maxine. I know that she has not been treated well when she has gone up to Pohakuloa on the various visits that were arranged by the DLNR and through the military. She has walked while your people have driven into sites that she was supposed to be able to review. You eat and you leave her outside with other kupuna. She is treated with absolutely no respect when she goes up there. Why we're here talking about an EIS when this is going on, I have no idea but there has been no -- no oversight and no clean up. The contract with the -- the DLNR and whatever you're trying to do now -- I say no, to no lease agreements, no land swaps, no buyouts, and no condemnation of our lands. The depleted</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>uranium that you lied about for years turned out to be true and you have no way to clean that up. The refusal to abide by a Supreme Court hearing, you have no feedback on. The fires in 2022 that were started by PTA that burned through Hawaiian Home Lands and charred over 10,000 acres, I am a beneficiary on Hawaiian Home Lands. The Red Hill water contamination, that was also lied about and stalled and is still a problem. Kaho'olawe, which you were supposed to clean up, that's still never happened. My -- again, Kānaka went and did that. My own family, my husband and my brother-in-laws went to clean up. Red Hill, lied about and still not taken care of. In 2014 there was a non-disclosure agreement between the Department of Hawaiian Home Lands and the military -- that was discovered at that time to exchange lands for Puukapu homesteads and this is a quote, "As with many of the lands that have been conveyed to the department, complete disclosure of prior use and the potential for ongoing issues have not been -- not been shared as a condition of transfer", which means that our village in 1975 was built with unexploded ordnances, possibly spread throughout our area and our homes were built. We didn't even know that that was going on. We had no idea. In 2014, all of this came out into the public about the lack of disclosure that Hawaiian Homes built our villages on. Thanks to the military we had no idea that that was even a problem. We were offered relocation to lessees who made such a request. In the meantime, we were told we should exercise caution on our lots, especially if we were performing any gardening or digging. Ground disturbance is an activity where we were told to curtail. Kuhio Village, again, was constructed in 1975. So you willing and with full knowledge allowed villagers, including agricultural and pastoral areas, to be built knowing the dangers existed. You continued to occupy Department of Hawaiian Home Lands as part of your complex, while tens of thousands of Kānaka continued to die on the waiting list. You desecrate burials and cultural sites. Your presence has already made us a direct nuclear target. So for anyone to say that that the military here makes us safer, that's actually not true.</p>	

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>We've been -- we've been a nuclear target for a long time due to your presence here. Now, one of the things that's come up that has been really disturbing for myself and others in the k̄anaka community is the training of genocidal occupying forces at Pohakuloa. We know for sure that the Indonesian Army was trained there and the slaughter and then genocide of the Papuan people that amounted to the death of 500,000. Also, Haiti, Sudan, Iraq, Congo, and Yemen, you're training combined with those forces oftentimes happen on these -- on Pohakuloa but also other military areas in Hawaii. So you occupy and you destroy lands on our moku so you can go to other indigenous people and other places in the world and destroy them and occupy their place. I specifically came tonight. I didn't even want to be here, but I came because of what's happening today. So today we have livestreamed genocide happening in Palestine. Today a ground assault began in Gaza to complete the ethnic cleansing of innocent Palestinian civilians, most of them children. Forty thousand civilians have been slaughtered and over fifteen thousand children. Over 70 percent of their homes, buildings and infrastructure have been destroyed, none of which has been carried out without the support of the U.S. military. The training for genocidal occupying forces and testing of compact ready ammunitions are conducted by the U.S. military, many of whom are trained at your PTA complex. Actions taken at PTA aid and abet war crimes, and they do not keep us safe. It has nothing to do with national security -- nothing to do with it. It has to do with occupying and continuing to occupy more indigenous lands. It is a violation of our spiritual values and the foundation of our people. So deoccupy (sic) Hawaii and demilitarize the Pacific.</p>	
Nawahine Kahoopii		<p>Nawahine Kahoopii, I'm speaking on behalf of my 'ohana, the Nawahine Kahoopii 'Ohana. I want to bring some attention to our kupuna that originally started a lawsuit in 2015, Auntie Makie and Uncle Ku, who are not here right now. In 2015, you were instructed by the Department of Land and -- Land -- Department of Land and Natural Resources was sued because you hadn't done any clean up</p>	<p>Sections 3.2.4 and 3.5.4 state that the Department of Land and Natural Resources has implemented the Court Ordered Management Plan and site visits are occurring. The Army has received no corrective action requirements from the site visits.</p> <p>The current status of range management activities</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>or had any inspections in your entire time that you've occupied Pōhakuloa. Those lands, the 132,00 acres that you have under your lease, many of which those acres are now uninhabitable. There's been no -- no oversight and there has been no clean up. So I'm really curious how you could do an EIS when you were sued and you lost, even all the way to the Supreme Court -- a Supreme Court's hearing that told you should clean up. The Department of Land and Natural Resources also lost that lawsuit and had -- you still haven't done anything.</p>	<p>regarding hazardous substances and hazardous wastes is discussed in Section 3.5.4. Section 3.5.6 describes the cleanup activities to be performed on any State-owned land not retained. In accordance with the lease and under the provisions of existing law, the Army retains responsibility for cleanup of closed ranges (i.e., State-owned land not retained). After the lease expires, the Army would follow federal law and regulations to determine how and when cleanup and restoration activities for hazardous substances and MEC within the State-owned land not retained would occur under the CERCLA process.</p>
<p>Kyle Kajihiro</p>		<p>Hi. My name is Kyle Kajihiro. I'm an assistant professor of ethnic studies at the University of Hawaii at Mānoa. I'm also affiliated with the Hawaii Peace and Justice, but these are just my individual comments, based on the past two nights of oral testimony. I watch both of the video streaming of the events. And I want to say, the first thing that came to mind was that what you saw with the various testimonies was evidence of the significant cultural impact on Native Hawaiians of the military use of Pōhakuloa. And so, rather than simply taking the comments of - as for the content of their of their text of what they're saying, I think that the overall experience of these testimonies should be analyzed as part of the cultural impact assessment, because they represent evidence of the kind of generational cultural trauma that Native Hawaiians have experienced because of the military taking of their land because of the military role in the overthrow of the Hawaiian Kingdom, because of the ongoing offenses to the 'āina by military training. I heard over and over again those themes repeated. And so I think that that needs to be part of the evidence that is analyzed as part of the cultural impact assessment; of the significant impacts of the ongoing military use of Pōhakuloa.</p>	<p>Section 2.2 of the CIA provides a discussion of the methods, derived from OEQC guidelines, applied to identifying individuals and/or organizations with relevant expertise and knowledge of the cultural resources, practices, and beliefs found within the broad geographical area.</p>
<p>Kyle Kajihiro</p>		<p>A few other thoughts that that came to mind is that the cultural impact assessment in the second draft of the EIS is deficient. I noticed that there was a dramatic difference, a dramatic decrease in the substance of the second draft cultural impact assessment. And I don't understand why</p>	<p>The first draft CIA was revised to improve readability, focus analysis within the project area and broad geographical area, and add information from new survey respondents and interviews. No information provided by</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		that is but I would say that that is actually making the document even worse and more superficial because it fails to take into account all the substance that was submitted as testimony in the previous draft	the interviewee and survey respondents was removed from the DEIS CIA.
Kyle Kajihiro		Also in both the first and second draft of this EIS I noticed that the archaeological studies are incomplete. Many areas within the leased lands have not been surveyed, but pretty much all of the Executive Order lands which are connected, right, to the state leased lands. Those areas have not been surveyed at all. And it's impossible to know what your impacts on the cultural sites, the resources in those areas, including the natural resources are without having been able to do that survey. So, your study is incomplete, and therefore the EIS is deficient.	Section 3.4.4.6 discusses the Army's CRM Program at PTA, including the State-owned land. Previous archaeological surveys are provided in Table 3-14 of the EIS. Section 3.4.4.3 discusses why portions of State-owned land have not been surveyed.
Kyle Kajihiro		Another comment I wanted to raise, and this is something I brought up in other testimony, and I'll bring it up again: You listed a number of supporting documents which was very helpful, and the links to those documents. One that I had looked at before was the Master Plan - the final draft of the real property master plan for Pōhakuloa Training Area, which is only a digest and I had requested, through the Freedom of Information Act, and have not gotten the full document. I would like to also request some of the items listed in the references of this document, which I think are very relevant to the current studies. So one document. So, in addition to the full - This is Kyle Kajihiro continuing my comments. I got cut off on the last part of it. So, I was talking about requesting a full copy, not the digest of the real property master plan for Pōhakuloa Training Area, which is dated in 2020. I think it was maybe February in 2020. And in there, it was - there was also listed in the references a number of documents that, I think are relevant to this draft EIS. So one was a June 4 <sup>th</sup> , 2018, US Department of Defense Assistant Secretary of Defense, a document entitled Approval of Major Land Acquisition, Waiver Request, US. Army Training Sites Hawaii. This was listed in the references, and I think it's important, because if we're talking about requesting some sort of a waiver, I'd like to know what was actually discussed, what was proposed, and what the	The Army Freedom of Information Act (FOIA) Library and FOIA Request process are available at: <a href="https://www.rmda.army.mil/foia/RMDA-FOIA-Division.html">https://www.rmda.army.mil/foia/RMDA-FOIA-Division.html</a> .

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>correspondence was related to that document. So please provide those documents in the supporting documents for this draft EIS. Another document that was listed in the references is the US Army Engineering and Support Center, Huntsville, Alabama. A 2009 document entitled Enhanced Area Development Plan, Pōhakuloa Training Area, Hawaii Final submittal. So, this document seems to be relevant to some of the land use proposals in this new draft. So please provide that document as well. Another document I'd like you to provide is the US Army Region, Hawaii, October 25, 2015 document entitled Memo for Commander US Army Region Hawaii, Approach to Training in Hawaii, A Strategy for PTA. So again, this is a US Army Region Hawaii Memo for Commander US Army Hawaii Approach to Training in Hawaii, dated October 25, 2015. So I would like to ask that those documents be made available so that we can evaluate how decisions have been made regarding this Pōhakuloa training area. Those are all the comments I have right now, and I'll submit other comments, written comments, later. Thank you.</p>	
<p>Kyle Kajihiro</p>		<p>And that should also factor into your analysis of the cumulative impacts. I think that cumulative impacts often fail to take into account the kind of accumulated trauma of things like the noise, things like the physical destruction of sites, that accumulate within communities. And you heard multiple generations testifying, many young people. And so that is a cumulative impact that needs to be seriously analyzed as to how this training continues to impact the Hawaiian communities that are subjected to those impacts. But also simply by the fact that it is occurring is constantly accumulation of this kind of trauma that's passed on.</p>	<p>Section 4.4 (Land Use, Historic and Cultural Resources and Cultural Practices, Noise, and Environmental Justice) refined to better describe cumulative, generational impacts on Native Hawaiians and the public from past PTA actions, the Proposed Action, and present and reasonably foreseeable future actions.</p>
<p>Kyle Kajihiro</p>		<p>The DEIS fails to identify and analyze the impacts of its proposed method(s) for retaining the land. Since the lands in question are part of the Government and Crown lands of the Hawaiian Kingdom and constitute Hawaiian trust lands, the method by which the Army retains the land is of material consequence and can have significant cultural and social impacts, especially for Kānaka Maoli. The DEIS erroneously concludes that acquisition of the land in fee</p>	<p>Section 3.2, Land Use, discusses in detail the historical context of ceded lands at PTA. Section 3.2.6 analyzes the impacts of lease and fee simple title, including significant adverse impacts from the continued Army use of public trust lands and alienation of public trust lands, respectively.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>would have the same impacts as retention through a new lease. Acquisition of the land in fee would constitute an alienation of Hawaiian land and exacerbate centuries of trauma associated with the overthrow and occupation of Hawai'i by the United States. If the Army were to proceed with acquiring the land in fee through a land swap or condemnation, it would constitute a taking from the public trust and from Kānaka Maoli in particular, whose genealogical claims to the land are superior to the claims of others. Without a full disclosure of the proposed methods of land retention and an analysis of their potential cultural and social impacts, this DEIS is deficient. The DEIS erroneously lists the impact area as "Army owned". However, this land is assigned to the Army by an executive order and falls within the larger corpus of Government and Crown Lands trust, otherwise known as "ceded lands". The "Hawai'i Military Land Use Master Plan (HMLUMP)" (U.S. Indo-Pacific Command 2021) correctly identifies the Pōhakuoa impact area as "Ceded Land".</p>	
<p>Kyle Kajihiro</p>		<p>The DEIS fails to make available for public review the documents pertaining to the Army's land acquisition proposal as presented to the Secretary of Defense. Despite numerous Freedom of Information Act (FOIA) requests for a copy of the "Approval of Major Land Acquisition Waiver Request - US Army Hawaii Training Sites, Hawaii," (2018) by the Assistant Secretary of Defense 2018, and for all correspondence pertaining to this waiver, which would include the U.S. Army Hawai'i, "Memorandum: U.S. Army Hawaii Major Land Acquisition Proposal," (2017), and despite requesting in public meetings that this information be included in the DEIS, the Army has failed to disclose the relevant documents. It is impossible for the public to understand the Army's intended actions and analyze their potential impacts without understanding the nature of the waiver for a "Major Land Acquisition" in Hawai'i that was requested and granted.</p>	<p>The Army Freedom of Information Act (FOIA) Library and FOIA Request process are available at:  <a href="https://www.rmda.army.mil/foia/RMDA-FOIA-Division.html">https://www.rmda.army.mil/foia/RMDA-FOIA-Division.html</a>.</p>
<p>Kyle Kajihiro</p>		<p>To date, investigations into the number and significance of cultural sites have been superficial. The DEIS should include a thorough inventory of the historic sites in the</p>	<p>Section 3.4 of the EIS, the appended CIA (Appendix I), and the ALR (Appendix J) provide information that the State can reference for the State to conduct a Kapa'akai</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>area, discussion of the cultural significance of Pōhakuloa itself, in relation to the larger cultural landscape, and a discussion as to how the condition of these sites has changed while the Army has used these lands. Kānaka ʻŌiwi and the general public currently only have limited access to Pōhakuloa, and therefore, are denied the right to fully enjoy and conduct cultural, religious, or subsistence gathering practices until the lands are cleaned up and restored. The DEIS should conduct a rigorous Kapaʻakai analysis of the proposed actions, which must include, (1) the identity and scope of “valued cultural, historical, or natural resources” in the petition area, including the extent to which traditional and customary native Hawaiian rights are exercised in the petition area; (2) the extent to which those resources -- including traditional and customary native Hawaiian rights -- will be affected or impaired by the proposed action; and (3) the feasible action, if any, to be taken by the LUC to reasonably protect native Hawaiian rights if they are found to exist. (Ka Paʻakai O Kaʻaina v. Land Use Commission, 94 Haw. 31. 2000. 36) The DEIS is deficient because it intentionally omits a Kapaʻakai analysis of the proposed actions until after a decision about retention of land has been made (3-61).</p>	<p>Analysis pursuant to the State's obligation under Article 12, Section 7 of the Hawaii Constitution to protect Native Hawaiian Traditional and Customary Native Hawaiian Rights.</p>
<p>Kyle Kajihiro</p>		<p>The CIA must consider the entire connected cultural landscape of Kaʻohe ahupuaʻa, Mauna a Wākea (Mauna Kea), and the surrounding cultural landscapes. Hawaiʻi law recognizes that in addition to built structures, a cultural resource may also be a natural feature of the landscape, such as a mountain, hill, rock, tree, stream, or animal which has cultural significance to Kānaka ʻŌiwi. This study should include an in-depth cultural landscape study (CLS) and ethnographic survey (ES). The Papakū Makawalu methodology, developed by the Edith Kanakaʻole Foundation, would be appropriate to employ in the assessment of the cultural meanings and significance of the affected area.</p> <p>Quoting the “Ethnographic Study of Pohakuloa Training Area and Central Hāmākua District, Island of Hawaiʻi, State of Hawaiʻi” (McCoy &amp; Orr, 2012), the DEIS suggests that</p>	<p>Section 3.4.2.1 clarifies that this EIS complies with the requirements of NEPA and HEPA. Since the Proposed Action is an administrative action, which is not the type of undertaking that has the potential to cause an effect on historic properties, Section 106 consultation regarding the proposed action is not required. Section 5.3.1 notes that ongoing activities facilitated by the Proposed Action have established mitigation measures through the 2018 Programmatic Agreement executed with SHPD and the Advisory Council on Historic Preservation. Section 5.3.2 discusses that compliance with Chapter 6E would occur after the EIS process.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>the region is not eligible for nomination as a Traditional Cultural Property (TCP) under NHPA, based on “a general lack of information in the literature concerning cultural practices and beliefs related to the Saddle Region, when compared to other, more populated areas of Hawaii” (3-61).</p> <p>But this Army-commissioned study did not use any Hawaiian language resources, and is therefore deficient and inherently flawed. In contrast, based on a very limited survey of sites in Pōhakuloa, the “Cultural Resource Evaluations of Stryker Transformation Areas in Hawai’i” (Monahan and SWCA Environmental Consultants 2009) concluded that the newly identified features are eligible for listing on the National Register of Historic Places. A more comprehensive TCP study needs to be conducted to determine Pōhakuloa’s eligibility as a TCP. In light of the recent designation of Mauna Kea as a TCP (Kiyuna 2024), and given the fact that Pōhakuloa and Mauna Kea both lie within the Ka’ohe ahupua’a, Pōhakuloa should be evaluated in a similar fashion for nomination as a TCP.</p>	
Kyle Kajihiro		<p>Most of PTA falls within the State Conservation District. As stated above, the Army has a duty to fulfill its obligations under the lease, consistent with State land use regulations, to mālama ‘āina. As the Office of Conservation and Coastal Lands testified on the first DEIS: It appears that military training is in direct conflict of the Conservation District designation to conserve, protect, and preserve the important natural and cultural resource of the State... It is inappropriate to conduct this type of warfare practice upon Conservation District land adjacent to areas designated as critical habitat for the Palila; and a recreational campground for the people of Hawai’i. (Mills 2022)</p>	<p>Compliance with HAR Chapter 13-5, Conservation District, has been revised and is discussed in Sections 1.4.2 and 5.3.2. Sections 1.4.2, 3.2, and 5.3.2 have also been revised to make clear that for analysis purposes, the EIS assumes BLNR would establish a special subzone in the conservation district through a rule amendment that allows for military training use.</p>
Kyle Kajihiro		<p>The greatest environmental justice impacts will be borne by Kānaka ‘Ōiwi who have the most profound connection to the lands in question. As I mentioned in my phone comments during the recent public meetings on the DEIS, the DEIS should include an ethnographic or sociological analysis of the testimonies delivered at the public</p>	<p>An ethnographic and sociological analysis of the testimonies given at EIS-related public meetings are outside the scope of the EIS. Per NEPA and HEPA, the Army considered and appropriately incorporated information and discussion relating to the testimonies and comments received on the project and Draft EIS</p>

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
		meetings as evidence of historical, multi-generational, cultural trauma	during the public meetings and the 45-day comment period, as summarized in Appendix D.
Kyle Kajihiro		The study claims that no PFAS chemicals were used on state-owned land, but fails to indicate whether PFAS was used in the Army controlled airfield. Please disclose all known uses and releases of PFAS within the Pōhakuloa complex.	Questions or comments regarding the Preliminary Assessment/Site Inspection conducted by the Army under the Defense Environmental Restoration Program are outside the scope of this EIS; however, please note that the Preliminary Assessment/Site Inspection investigated other sources of polyfluoroalkyl substances (PFAS) than aqueous film-forming foam (AFFF), including metal plating operations, photo-processing areas, wastewater treatment plants, pesticides, and landfills. The areas identified for further investigation in a Remedial Investigation are on U.S. Government-owned land, not State-owned land.
Kyle Kajihiro		DEIS is incomplete because comprehensive baseline studies of the biological resources have not been conducted in all areas, especially within the impact area. It is impossible to assess possible impacts to biological resources due to the proposed training activities without such a study.	<p>The EIS does not propose training activities, all training activities have been analyzed under previous NEPA as noted on Table ES-1.</p> <p>Section 3.3.4 and Appendix K have been updated with more recent scientific data and surveys. For safety reasons, the Army cannot survey the impacts area; however, mitigation measures the Army would consider include: (1) a multi-year research project to identify possible biological controls in the native range of <i>C. setaceus</i> (fountain grass); (2) installation invertebrate surveys; (3) an ungulate impact assessment; (4) negotiation of an agreement with the State to monitor wildfires on land not retained; and (5) implementation of additional thermal technology. These mitigation measures have been added to the Mitigation Measures subsection.</p> <p>The Proposed Action is a real estate action (i.e., administrative action) that would enable continuation of ongoing activities on the retained State-owned land. The Proposed Action's consistency with regulations, land use plans, policies, and controls is provided in more depth in Section 5.3.</p>
Kyle Kajihiro		I have tried to obtain more background information on the proposed real estate action. My searches led me to a	The Army Freedom of Information Act (FOIA) Library and FOIA Request process are available at:

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>digest of the Real Property Master Plan (RPMP) Pohakuloa Training Area, Hawai'i Island - Final (HHF Planners 2020a). While this was helpful, I wished to study the full master plan. However, the document was not publicly available. Also, the RPMP makes reference to a number of documents that would be relevant to understanding the proposed action. Please make these documents publicly available:</p>	<p><a href="https://www.rmda.army.mil/foia/RMDA-FOIA-Division.html">https://www.rmda.army.mil/foia/RMDA-FOIA-Division.html</a>.</p>
Kyle Kajihiro		<p>Hundreds of pages were removed from the Cultural Impact Assessment (CIA) report in the second DEIS. Why was the CIA report watered down and testimony and evidence suppressed?</p>	<p>The first draft CIA was revised to improve readability, focus analysis within the project area and broad geographical area, and add information from new survey respondents and interviews. No information provided by the interviewee and survey respondents was removed from the DEIS CIA.</p>
Kyle Kajihiro		<p>The EIS must provide a complete history of wildfires at Pōhakuloa, including the dates, causes, extent of damage, and responses. Please provide a table listing fires at PTA and relevant details about the size and impacts of the fires. How have fires changed the landscape and ecology over time? Have there been any audits of the sufficiency of existing firefighting capabilities to combat wildfires? Please provide any such assessment of the firefighting capabilities. Federal firefighters at Pōhakuloa are primarily equipped and trained to fight fires related to the airfield and base facilities. They are not trained or properly equipped to fight wildfires. UXO hazards hinder firefighting at PTA. The Leilani fire is an example of this problem. How will climate change increase the risk of wildfires? What percentage of wildfires at Pōhakuloa are caused by military training versus other causes? This analysis is necessary to determine the risk posed by the proposed action.</p>	<p>Section 3.3.4.2 discuss landscape and ecological impacts from the most recent PTA fires in 2018, 2021, and 2022. Section 3.16.4, Wildland Fire Management includes information on PTA fire response capabilities and future plans for wildland fire response improvements. See Section 3.16.4, Wildland Fire Management for fire statistics. The text in Section 3.16.4 has been revised with additional information on historical wildland fires that have occurred on State-owned land and a table has been added summarizing historical fires documented on State-owned land since 2012. Additional text has been added to Section 3.16 regarding increased wildfire risk as a result of climate change. Mitigation measures the Army proposes include (1) negotiation of an agreement with the State to monitor wildfires on land not retained and (2) implementation of additional thermal technology. These mitigation measures have been added to the Mitigation Measures subsection.</p>
Kyle Kajihiro		<p>What are the climate impacts of the military activities at Pōhakuloa? The DEIS fails to analyze the amount of fossil fuels consumed by all training activities to and from the training area, the fossil fuels consumed during training activities, and their associated carbon emissions. Given the recent Lahaina Fire, and the omission of military carbon emissions from much of the climate change reporting, the climate change impact of the military</p>	<p>Section 4.4, Air Quality and Greenhouse Gases, revised to clarify the climate change impacts analyzed in Section 3.6.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		activities at Pōhakuloa are an important cumulative impact that must be analyzed. Recent studies of the climate impacts of the Ukraine war provide some methodologies that could be applied here.	
Kapeliela Kalawaia		I just have a few words to say to you. A couple months ago Mauna Loa erupted, y'all recall. She's tired. She's hurting her foundation. All I have to say is next time heads up. Aloha.	Please see General Response 1.
Kepa Kali		Aloha, My name is kepa, and I'm from the island of Kaua'i, The Garden Isle of The Hawaiian Islands. I truly dislike the fact of destroying Hawaiian Lands with fire arm use or explosive use. It is unnecessary to be bombing anything on sacred and well taken cared land; it's just plain out disrespecting our culture, our heritage, and our lives. Please think before doing anything in life, and stop the bombing on Pohakuloa ASSP!	Please see General Response 1.
DreanaLee Kalili	Association of Hawaiian Civic Clubs	In review of the State of Hawai'i Department of Health (DOH) comments to the First Draft Environmental Impact Statement (FDEIS), it expressed difficulty in obtaining the Environmental Condition of Property (ECOP) conducted in 2015 for PTA. The FDEIS stated the "ECOP identified potential munitions-related hazards on the State-owned land, as well as other potential environmental hazards." The U.S. Army provided a hyperlink to additional documents, but our reviewers did not find the original ECOP within the link provided. We strongly urge that the ECOP be included into the SDEIS and that copies be provided to the DLNR and other relevant agencies as part of the lease renewal process. In addition, the DOH was adamant about ensuring a requirement of a new lease include "the identification and cleanup of all environmental hazards on State-owned land" and "ongoing investigation and clean up of firing points." In response, the U.S. Army revised the DEIS to explain the efforts in Section 3.5.4.11 which states the removal of solid waste, and deactivation or removal of all live and blank ammunition. The AOHCC recommends the U.S. Army clearly point out mitigations under the law, DOH's concerns and other actions that the DLNR deem	Links to the Phase I and II ECOP reports have been added to the PTA EIS website ( <a href="https://home.army.mil/hawaii/ptaeis/project-home">https://home.army.mil/hawaii/ptaeis/project-home</a> ) under the "Documents" tab. As noted in Section 1.5.2, State decisions following acceptance of the EIS may include the land retention estates and methods as well as associated terms (e.g., lease conditions) in any new real estate agreement. Sections 3.5.6.1, 3.5.6.2, and 3.5.6.3 state that for all State-owned land retained by lease, "It is assumed that DLNR would continue to implement the COMP or develop and implement a revised lease compliance monitoring plan to confirm lease compliance, particularly with respect to military munitions and MEC." Section 3.5.6 describes the cleanup activities to be performed on any State-owned land not retained. In accordance with the lease and under the provisions of existing law, the Army retains responsibility for cleanup of closed ranges (i.e., State-owned land not retained). After the lease expires, the Army would follow federal law and regulations to determine how and when cleanup and restoration activities for hazardous substances and MEC within the State-owned land not retained would occur under the CERCLA process. As stated in Section

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>necessary, and to make that easily accessible for the public. The AOHCC also acknowledges the use of PTA by state and county agencies for training, and use of the facility by community organizations such as the American Red Cross, Boy Scouts of America, Girl Scouts of the USA, and the Hawai'i Youth Challenge program. We urge continued access and use by these organizations as needed irrespective of the disposition of a new lease.</p>	<p>3.5.6, the analysis contained within the EIS has concluded that no mitigation measures are recommended beyond the existing management measures described in Section 3.5.4.14. The Proposed Action is a real estate action (i.e., administrative action) that would enable continuation of ongoing activities on the retained State-owned land. The Proposed Action's consistency with regulations, land use plans, policies, and controls is provided in more depth in Section 5.3.</p>
DreanaLee Kalili	Association of Hawaiian Civic Clubs	<p>Aloha: On behalf of the Board of Directors of the Association of Hawaiian Civic Clubs and our 3,500 Hawaiian Civic Club members, I am submitting the following comments on the Second Draft Environmental Impact Statement Army Training Land Retention at Pōhakuloa Training Area Ka'ohē Mauka and Humu'ula Ahupua'a, Hāmākua and Hilo Moku, Hawai'i Mokupuni Tax Map Key: (3) 4-4-015:008; 4-4-016:005; 7-1-004:007; 3-8-001:013 and 022. The Hawaiian Civic Club movement was founded in 1918 by Congressional Delegate Prince Jonah Kūhiō Kalaniana'ole with the creation of the Hawaiian Civic Club; the Association was formally organized in 1959 and has grown to a confederation of 61 Hawaiian Civic Clubs with more than 3,000 members located throughout the State of Hawai'i and the United States.</p> <p>The Association is the oldest Hawaiian community-based grassroots organization and advocates for improved welfare of Native Hawaiians in culture, health, economic development, education, social welfare, and nationhood; and perpetuates and preserves language, history, music, dance and other Native Hawaiian cultural traditions. At its annual convention in 2017, the Association of Hawaiian Civic Clubs adopted Resolution 2017-54, which addresses fair compensation, access for Native Hawaiians, and requires ample funds placed in escrow for the remediation of the land and removal of all ordinance and unwanted structures upon termination of the State's General Lease No. S-3849. The Hawai'i Supreme Court ruling in <i>Ching v. Case</i> (2019) requires that the State promptly initiate affirmative activity at the PTA in accordance with its trust duties by developing a written plan to fulfill such duties.</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>The plan is required to include provisions for (1) on-site monitoring and inspections, (2) the creation of written inspection reports with recommendations, (3) a written protocol of appropriate action to be taken if the United States is to be found to be in breach of the lease, (4) a procedure to provide for “reasonable transparency” to the Plaintiffs and the general public with respect to compliance with the injunction, and (5) all steps that the State takes to “secur[e] adequate funding, from any and all appropriate funding sources, to plan, initiate, and conduct all appropriate comprehensive cleanup.” and; that the Office of Hawaiian Affairs (OHA), on behalf of the interest of Native Hawaiians requested a withdrawal of the 2022 DEIS due to the uncertainty that the State of Hawai’i Department of Land and Natural Resources (DLNR) had begun to implement the court ordered management plan. By releasing a DEIS prior to implementing the court order action appears to rush the lease renewal process which minimizes the Hawai’i Supreme Court’s decision.</p>	
Noelani Kalipi		<p>Aloha. My name is Noe Kalipi. I'm a Hawaii Island resident and I also want to share that I have a position as a volunteer as the civilian aid to the secretary of the Army and my comments are not being made on behalf of the Department of the Army. They are my personal comments. I'm here to share that after reviewing the EIS, I'm testifying in support of the modified retention and preferred alternative. I think this is an important opportunity as the leases expire, for Hawaii to shift it's relationship with the United States military and how we as a community, and how the federal government meets this opportunity is vitally important. For many, Hawaii's relationship with the U.S. military field is like a tangled web. There is a sense of honor for the legacy left by our kūpuna and ‘ohana, who have served and defended the freedoms we enjoy today. There is support for the commitment made by our cousins, our aunties or uncles, our mothers, our fathers who are currently serving in active duty, as well as the National Guard, who can deploy at a moment's notice. There is also great sorrow over the</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>lives that have been lost in action and training and a fear that those who are now serving may be forced to make the ultimate sacrifice. And as we've heard, there is also concerns over a system that relies on military force to enforce the fragility of peace, yet our geographic location in the middle of the Pacific, 2500 miles from the nearest land mass underscores the stark reality of the strategic importance of maintaining peace in the Indo-Pacific. And how we as a community meet this opportunity to shift the relationship and move together collaboratively is vitally important. And there is a need to make things more pono, from the need to pay fair market value for leased lands to the need to ensure that 'āina is treated with respect. There is lots of opportunity to improve. It is also important to note, however, that the Army has invested a lot of resources to protect endangered species. And on our island, one of the biggest benefits is the emergency response from the summits of Mauna Kea to Mauna Loa from the 12-mile marker to the 51-mile marker of the Daniel K. Inouye highway, and just being able to respond and meet the needs of everyone who needs to be rescued or addressed there. Some feel strongly that the military should leave Hawaii or at a minimum, should minimize its live fire training and the question remains, could the Army train in a way that reduces its impact to the 'āina. We can be hopeful that a new technology can provide that in the future, yet there is no doubt that live fire training is absolutely required and vital to compact preparation. And when I look into the eyes of the many men and women defending our country and see their determination and drive, I want to ensure that we have the best training available for them to return alive. So many of our kūpuna have said the answer lies with aloha and that Hawaii will play a vital role in showing the rest of the world the path forward and it's up to us -- all of us, to define what that means in a process to untangle the web of fear, trauma, and unrest. The choices is ours to shape this with aloha. Thank you.</p>	
Noelani Kalipi		My name is Noelani Kalipi and I was born and raised in Hilo. I also have a volunteer position called the Civilian Aid	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>to the Secretary of the Army. The comments I am making today are my own and do not represent the Department of the Army. I'm testifying in support of the preferred option presented in the EIS. And while I hope at some point, in the future, the army won't need to use as much land for training, I don't think that time is now given everything that is happening in the world. I do, however, think that the time is now to reshape our role and relationship as residents of Hawaii with the United States Army and to identify pathways forward for the co-management of Pohakuloa in preparation for a time in the future where the army may not need as much lands to train. Both of my grandfathers, Native Hawaiians from Hilo, are World War II veterans. And while I understood their service, I grew up questioning why our federal dollars were going to the Department of Defense rather than to education and to social services. I come from a family, however, that believes in learning about what we don't understand and what we don't know. So after law school, when I was dared to go on to active duty in the United States Army, I took the dare and I served for three years. I gained a lot more respect and understanding for what it takes to protect and ensure the freedoms we all enjoy today. I also had the privilege of working for United States Senator Daniel Kahikina Akaka, a World War II veteran, and the first Native Hawaiian senator who authored Public Law 103-150, the apology resolution. In the -- in the resolution, the United States not only apologizes for its role in the overthrow of the kingdom of Hawaii, but it also commits to a process of reconciliation with Native Hawaiians. And I raise this because we have a tremendous opportunity to reshape our relationship with the United States Army going forward. And while this EIS process is not set up for a dialogue, we can't get to the end result without a meaningful dialogue. And it's important for all of us to fully participate in this process and also look for ways to collaborate. Our geographic location 2500 miles from the nearest landmass is what makes us a strategic location in the Pacific with or without the military's presence. The Army, in recent years, has recognized the need to be</p>	

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>better stewards. They also make a significant contribution to our island economy and provide valuable training and jobs for Hawaii residents. No question that we can do more, that they -- that more can be done. Our -- our purpose is to be able to do it together. Just have one more part to finish. Some feel strongly that the military should leave Hawaii or, at a minimum, should minimize its live training activities. Could the army, at some point, train in a way that minimizes impact to 'āina? I would hope so given the advances in technology; yet there is no doubt that live fire training is vital to combat preparation. And when I look into the eyes of the men and women, many of whom I'm related to and know who are defending our country and I see their determination and drive, I want to ensure that the best training is available for them to return alive. I do believe we can create the pathways to do this together. Thank you.</p>	
Keleka Kam		<p>We do not want the military getting a new lease to destroy our land that is rightfully and belongs to the hawaiian people. Destroying the land, will not give our next generation a chance to enjoy it, with all the destruction you guys have been doing.Land back.</p>	Please see General Response 1.
guy Kaniho		<p>How does PTA / federal government intend to be a good neighbor to the community in Humuula? The use of the DHHL lands by PTA has not delivered any benefits to those who legally lease and homestead the immediate adjacent lands at Humuula. We at Humuula have endured the activities of PTA for the past few decades but have not any received any compensation or assistance from PTA. Now the federal government wants to extend there lease and continue the the above mentioned activities. Not to mention that as technology advances, what other activities may be practiced at PTA which could be disruptive to the MOST immediate neighboring community at Humuula.</p>	Please see General Response 1.
guy Kaniho		<p>Again, I ask how does PTA / the federal government plan to address these concerns of excessive noise, future damage to infrastructure and structures. What kind of fair compensation or assistance can PTA / the federal</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		government provide to the beneficiaries who legally occupy and live at Humuula.	
guy Kaniho		As a neighbor to PTA for the past few decades, there has been no attempt to provide assistance or access to resources that the camp has or are capable of providing, if they chose to be a good neighbor. After all they are utilizing DHHL lands as are we in Humuula, however the difference is that they have the federal government to provide funding. We fund with our own money of which we pay federal and state taxes. I look forward to a response to my comments.	Please see General Response 1.
guy Kaniho		How does the PTA /federal government intend to address the noise ( explosions / artillery ) created by pta to the surrounding community located at Humuula. There are times that the explosion are so intense that the windows and house shake. So far there are no visible damage however the continued activity could lead to foundation / structural issues.	<p>The EIS evaluates noise in terms of the Hawai'i State Department of Health "Hawai'i Maximum Permissible Sound Levels", DoD's Installation Compatible Use Zone and Hawai'i Statewide Operational Noise Management Plans, as well as Army Regulations that categorize noise exposures. Noise modeling is a scientifically proven method of assessing noise impacts. A noise modeling study was done in 2020 that considered noise zones for military munitions using a baseline model (EIS Figure 3-11), a neutral weather model (EIS Figure 3-12), and a model for weather conditions that enhance sound propagation (EIS Figure 3-13). Analysis of the models indicate that less than significant (LUPZ) and generally not compatible (Zone II) noise levels extend slightly beyond the PTA boundary; however, the overlaps occur over uninhabited forest reserve areas and no noise-sensitive lands are impacted. It is understood that noise can be heard beyond the model contours, particularly during inclement weather as discussed in Section 3.7.4; however, any noise that reaches noise-sensitive lands would be less than significant.</p> <p>Table 3-22 "Noise Limits for Noise Zones" discusses C-Weighted sound levels, which measure percussive vibrations associated with sound.</p> <p>Please see Section 3.7 for additional information on noise and noise analysis. Noise complaint information can be submitted to Pōhakuloa Public Affairs at <a href="mailto:usarmy.pta.id-">usarmy.pta.id-</a></p>

Responses to Second Draft EIS Comments

Commenter	Submitted By	Comment	Response
			<p>pacific.mbx.pta-pao@army.mil or 808-787-7839. Please note that concerns are responded to during regular business hours, Monday through Friday, 8:00 a.m. – 4:00 p.m., excluding holidays.</p>
guy Kaniho		<p>As a result of the activities of PTA / the federal government, the feral sheep problem has increased in the Humuula area. It is my understanding that the training areas for PTA have been fenced off to keep the feral sheep from returning to those areas, so training can continue. This practice has impacted the adjoining properties, most importantly Humuula. On the one hand you have the state fencing off the uplands of Maunakea to keep the sheep out of the forest areas in an attempt to reforest, but yet you have the federal government fencing off their training areas so they can continue training. Where are these animals to go? Humuula, so again we the legal homesteaders who were awarded these lands, on the current plan of CATTLE RANCHING are impacted by your activities, How does PTA / the federal government plan to fairly compensate us for our losses, for possible damages that may occur to our structures, to our infrastructure.</p>	<p>Sections 3.2.4.2 and 3.3.4.2 have been updated with additional information on public hunting and PTA game management. In compliance with the 2022 PTA hunting policy and iSportsman management, and pending training compatibility, the Army permits public hunting on PTA on weekends and national holidays.</p> <p>The Army has conservation law enforcement officers and game management support that work to control ungulates at PTA and support the hunting program. The Army would consider an ungulate impact assessment as a mitigation measure.</p> <p>Management of wild ungulates outside of the PTA boundary is beyond the scope of this EIS.</p>
Alakai Kapanui		<p>I want to point on that there is no impact assessment done on the water aquifer sitting beneath the Pohakuloa training area, which is preceded by the way you people treated the water aquifer on Kohe Malamalama o Kanaloa, also known as Kaho’olawe , since you probably don’t know anything about this place.</p>	<p>The best available scientific data for groundwater and surface water quality was incorporated into this EIS. Groundwater and surface water quality are discussed in Section 3.9 of the EIS. Section 3.9.4.6 of the EIS documents the existing management measures utilized by the Army to protect water resources. The State Department of Health (DOH) Safe Drinking Water Branch (SDWB) monitors groundwater quality of aquifers as described in EIS Section 3.9. SDWB has released groundwater contamination maps for Hawai’i Island that show most contamination is along the eastern coast of the island. The DOH SDWB Environmental Health Portal can be accessed at <a href="https://eha-cloud.doh.hawaii.gov/sdwb/#!/home">https://eha-cloud.doh.hawaii.gov/sdwb/#!/home</a>Section 3.9.4.2 has been updated to include additional information from the Thomas (2019) report. A link to this report has been added to the PTA EIS website (<a href="https://home.army.mil/hawaii/ptaeis/project-home">https://home.army.mil/hawaii/ptaeis/project-home</a>) under the “Documents” tab.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
Alakai Kapanui		<p>Aloha mai kakou, o Alakai Kapanui kou inoa, a noho Lanihau o Kona, Moku o Keawe wau. You know, three minutes is not enough time to talk about all of the issues that you people are causing on our 'āina, but at the same time, it's far too much. I was here to give testimony in October 2022 for the first EIS, which was a joke by the way, and Suzanne Case actually did a good thing by not signing off on that. We all deeply -- and all of us who are deeply opposed to any option besides a no action alternative to the lease renewal or any land retention on your people's part, it's clear to all of us who have been paying attention and giving testimony that when we say 'a'ole, you don't listen and really, that's what's all -- that's all that should be required. You have a foreign military base that's set up on Hawaiian Crown Lands and the Kanaka 'Oiwi are the direct beneficiaries of the 'āina that is in question. And I'll tell you right now, that we as 'Oiwi do not benefit from your poisoning our water aquifers, our air, from the destruction of our sacred sites, including heiau and iwi kupuna from constant disruption of endangered species nesting habitats and migrations, or the lead poisoning and the winds that the community of Waikoloa suffer from, which you also deny.</p>	Please see General Response 1.
Alakai Kapanui		<p>And none of our 'āina that you bomb indiscriminately will ever been restored to the way that it was. We see these examples at Makua Valley. We see the example of Kohe Malamalama o Kanaloa . We know that it will never be accessible the way that it used to be. We will always have to be cautious of -- of UXO. And we know from our cultural access to Pohakuloa training area, that you have not cleaned up anything. There is UXO 10 -- 15 feet away from the highway. I drive by that all the time. I see the dust storms that come up.</p>	Please see General Response 1.
Alakai Kapanui		<p>You can't even pronounce Pohakuloa correctly. And that 'āina is still not restored and cleaned up or anything of that nature. We -- we are doing it. There is also -- going off of what was said before me of how you do 'āina restoration, that's in your budget. There is millions of dollars that are allocated for that. You people don't do</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		that out of the goodness of your heart. You do it because it's required by federal law.	
Alakai Kapanui		We have said no so many times, and the fact that you people keep coming back and making us tell you no over and over and over again, without doing anything is in insulting. I lā Maika'i.	Please see General Response 1.
Alakai Kapanui		Alakai Kapanui. I want to say one last thing about you guys hosting RIMPAC this summer and understanding that over 30 foreign militaries will also be participating in these games. I am deeply opposed to members of the Israeli occupying forces, who are currently committing genocide on the Palestinian people in Gaza, specifically their bombing of Rafah right now as we sit here in this auditorium or gymnasium, whatever this is -- and I understand that they participate every two years and I find it deeply offensive that we allow them to come to this place and understanding that they contribute to the missing and murdered indigenous women that go missing and the -- the study that was produced by OHA two years ago and we know that those numbers spike every time RIMPAC is hosted. And we know that they come to this island, and they particularly participate on Oahu but we are also affected over here.	Please see General Response 1.
Alakai Kapanui		And I know that they test their white phosphorus on our water aquifer, as well. And so not only depleted uranium and lead poisoning, but there is white phosphorus that percolates down into our waters and poisons our own people and then goes out into our ocean and you guys need to do better and I hope you're paying attention.	The best available scientific data for groundwater and surface water quality was incorporated into this EIS. Groundwater and surface water quality are discussed in Section 3.9 of the EIS. Section 3.9.4.6 of the EIS documents the existing management measures utilized by the Army to protect water resources. These procedures minimize impacts on water resources from ongoing activities. The State Department of Health (DOH) Safe Drinking Water Branch (SDWB) monitors groundwater quality of aquifers as described in EIS Section 3.9. SDWB has released groundwater contamination maps for Hawai'i Island that show most contamination is along the eastern coast of the island. The DOH SDWB Environmental Health Portal can be accessed at <a href="https://eha-cloud.doh.hawaii.gov/sdwb/#!/home">https://eha-cloud.doh.hawaii.gov/sdwb/#!/home</a>

Responses to Second Draft EIS Comments

Commenter	Submitted By	Comment	Response
			<p>Section 3.5 Hazardous Substances and Hazardous Wastes presents the existing conditions from current activities at PTA and notes that risk of contaminants mobilizing is not a concern as limited surface water and groundwater pathways on the State-owned land pose minor potential impact to soil and groundwater quality. Section 3.5.4.11 describes the lack of mobilization of munitions constituents, including lead, within soil, groundwater, and surface water.</p>
Alakai Kapanui		<p>I know that there's lead and you don't care about the people on this island -- and all of that leaches down into the water aquifer. You have to do an impact assessment on the water aquifer .</p>	<p>The best available scientific data for groundwater and surface water quality was incorporated into this EIS. Groundwater and surface water quality are discussed in Section 3.9 of the EIS. Section 3.9.4.6 of the EIS documents the existing management measures utilized by the Army to protect water resources. The State Department of Health (DOH) Safe Drinking Water Branch (SDWB) monitors groundwater quality of aquifers as described in EIS Section 3.9. SDWB has released groundwater contamination maps for Hawai'i Island that show most contamination is along the eastern coast of the island. The DOH SDWB Environmental Health Portal can be accessed at <a href="https://eha-cloud.doh.hawaii.gov/sdwb/#!/home">https://eha-cloud.doh.hawaii.gov/sdwb/#!/home</a></p> <p>Section 3.5 Hazardous Substances and Hazardous Wastes presents the existing conditions from current activities at PTA and notes that risk of contaminants mobilizing is not a concern as limited surface water and groundwater pathways on State-owned land pose minor potential impact to soil and groundwater quality. Section 3.5.4.11 describes the lack of mobilization of munitions constituents, including lead, within soil, groundwater, and surface water.</p> <p>Section 3.9.4.2 has been updated to include additional information from the Thomas (2019) report. A link to this report has been added to the PTA EIS website (<a href="https://home.army.mil/hawaii/ptaeis/project-home">https://home.army.mil/hawaii/ptaeis/project-home</a>) under the "Documents" tab.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
Nahalelaau Onaalii Kapaole		The people of Hawaii do not consent to further taking, compromising, disrespect and desecration of any lands and resources of the Hawaiian islands - especially Pohakuloa. The use of live fire rounds and training exercises on illegally occupied and stolen Hawaiian kingdoms lands is unacceptable, and any attempt to continue those violent, toxic and wasteful operations will be met with resistance from the people and supporters of Hawaii and Mother Earth unlike anything the world has yet seen. This is your final warning - please "malama aina" clean up your toxic mess and leave the islands for good, or our gods and our relatives will join forces to take their revenge	Please see General Response 1.
James Kanani Kaulukukui		First name is James, middle name Kanani, and everybody calls me Kanani. Last name is Kaulukukui, Jr. Okay. I was born in Hilo and raised in Kona like Hawaiians you say -- you always say, who you? That means, who your family -- who you come from. Yeah. I come from my family, grandparents, Kohala. Kohala is deep -- deep when you get into that. So as far as what you're talking about here, you're talking about PTA. I spent four years in the Airforce, '68 through '72. In '72 I was at Cam Ranh Bay. We -- they were closing down the base so you got a lot of the aircraft out of there. So I came back, and I went to college. I have to use my GI Bill. I got (unintelligible) for drafting and then I went back to school, got -- got into geography. I wanted to get into urban planning and then also mining in geology, but then things happened, and I had to go to work. Everybody thought I was going to be a police officer. I didn't want to do that, but I had to. I got into the police department. Five years stationed here in Waimea from the (unintelligible). I went over to DLNR. I was a conservation resource enforcement officer. And when I raised my hand, my hand was to protect the natural resources of this state. You hear my voice is cracking because it's -- it's an emotion thing for me. Another emotional thing for me is not too long ago I found out that way before, in the 40s, 50s, it was against the law to speak Hawaiian. I says, how come you can't just speak it in public -- because I found out you want to kill a culture, kill its language. So the	Please see General Response 1.

Responses to Second Draft EIS Comments

Commenter	Submitted By	Comment	Response
		<p>language was spoken at home and that prevailed, now they're coming back. Also, in -- not '64, a couple of years ago. I do art. I was doing a show and I got into saying who I was. The president of that place here Waimea came and said this was interesting. And up until 1964, it was against the law for Hawaiian families to give their kids first Hawaiian names -- against the law. They final repealed it so now they can. So again, what happened to the Kānakas? Still trying to -- but hey, we came back. We're back and we're not going away because you all are getting educated. Yeah. So where I'm going -- I'm going from this, is we have to protect our natural resources, Mauna Kea, the aquifers. Waikoloa PTA is sitting on a big aquifer. It's right between Mauna Loa and Mauna Kea. It's right in here, water goes onto Wailuku. They had a hearing. They want to tap into the aquifer to feed Waimea up towards Kohala. No, because they have their own water resources and they all tied up up there by it's another issue. So PTA, I'm just stating that -- yeah. They want to get out of Honolulu because it's shrinking. Population is getting big, so they want to move over here. They bought all the land coming back down to the lower road. So it's like man, can you see barracks all the way here. Now they have to tap into a water to feed all that. Yeah. PTA, the gulch, the spring. You heard the story that, oh, the spring was just enough water to feed PTA. It was great. You didn't have to haul water. An engineer comes in. What if we put a little discharge (sic) up there and open the spring up and bring more water up. They did that and they lost the spring. That's why you guys got to haul up water now. Okay. So the Hawaiians all knew this. That's what they thought. That's why they closed the land. You got to be close, that's why, oh, I get into like -- I like bringing Nicola Tesla into this. To understand the universe, you understand three things, energy, frequency, vibration. The Kānakas all knew this. Kalani Flores mention about frequencies and vibration and the piko of Mauna Kea and its importance to the land and its importance to the people. Yeah. And I can understand the military's side of it, you know. You guys got to train. You guys got to -- sometimes I think, do we</p>	

Responses to Second Draft EIS Comments

Commenter	Submitted By	Comment	Response
		<p>have to use explosives with the technologies. Hey, use -- like they train the police. Use rubber bullets, non-destructive stuff and -- yeah. And it's about love and light. Before that Japanese scientist wrote his book on water, his memory -- a photo -- war -- this. What does the water look like? Muddy -- all muddy water -- love, like flowers, it's peaceful, calm, it looks like a -- it looks like a snowflake. So words have power. The uniforms you wear, have power. How about -- we say, have power. You mentioned the word war, it's, you know, fight, it's confrontation. Oh, Hawaiians do that. When power came up and it was a peaceful -- Hawaiians got to -- when he came up, cousins fighting cousins. It was not like that before. It was all peaceful. They never had a standing army. They didn't need one until one other guy comes up and said, here, I can take over this place. His buddies gang up, took over, changed it, and brought war. So sometimes, as you say, to get over war, you got to have peace. I don't know where the -- is. If you want peace you got to prepare for war -- but no. But sometimes yeah, it's a given. What do you do? But as far as PTA, (unintelligible) the bombing that impacted destruction part is the one that has got to stop because that fracturing the earth and everything, it's just -- it's a vibration going down in the aquifer and that causes fractures in the substrata. Good thing I went to school, I kind of learned stuff. So yeah. So basically -- yeah. So if there's a for or against, yeah, I'm against it. Yeah, but there's some concessions you can work around, you know, non-violent stuff. You guys got the technology. They're working on it. Okay. I'm going to shut up now. Thank you.</p>	
Lehua Kaulukukui		<p>Aloha, Lehua Kaulukukui, Waikoloa, right down the road from here, where we can hear the bombing and we see the effects of the bombing, but I wanted to say that I've been to Kaho'olawe three times. And in 1981, while I was on Kaho'olawe with a group, with my hula halau, Halau O Kekuhi, we were at a spot where we overlooked the targets. And at that time there was no end in sight to the bombing of Kaho'olawe, but as we were there looking at the targets, I had this deep feeling in my na'au that the bombing was going to stop. And it took years but</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>eventually it did. And this is the same feeling that I have right now that the bombing at Pohakuloa will stop no matter what. Uncle says that he is a man of few words and so am I. I'm a person of few words. I feel with my na'au. You heard everybody say about the waters, that you're poisoning with the bombing. You poisoned Kaho'olawe . You poisoned Red Hill and you poisoning us and it's going to stop. It will. We don't want it. We don't want Pohakuloa. Enough is enough. It's not rocket science for you to see that Mauna Kea, Mauna Loa -- you're in the center. You're in the piko of our island and you're poisoning us. Enough is enough. It will stop. Mahalo.</p>	
Lauae Kekahuna	'O Maku'u ke kahua community center	<p>On behalf of the Native Hawaiian 'O Maku'u ke kahua community Center non-profit organization. We oppose the Army Training Land Retention at Pohakuloa Training Area on the island of Hawai'i. Due to the fact that each time a bomb is released for practice reasons is a negative impact that happens to our land leaving that target area contaminated. The army has no plans for safety reason in cleaning up the contaminants. Our land can never be restored back to occupy which leads to our main reason why we do not support the Army training Land retention at Pohakuloa. To stop this negative impact to our lands the Army must stop, remove and restore the land to its original form and move back to the mainland. Mahalo</p>	<p>The current status of range management activities regarding hazardous substances and hazardous wastes is discussed in Section 3.5.4.</p> <p>Section 3.5.6 describes the cleanup activities to be performed on any State-owned land not retained. In accordance with the lease and under the provisions of existing law, the Army retains responsibility for cleanup of closed ranges (i.e., State-owned land not retained). After the lease expires, the Army would follow federal law and regulations to determine how and when cleanup and restoration activities for hazardous substances and MEC within the State-owned land not retained would occur under the CERCLA process.</p>
Merania Kekaula		<p>Dear Matthew Foster, To whom it may concern: As a person who loves Hawai'i and her people, I am firmly opposed to the Army's retention of any of the "State" lands at Pōhakuloa. I support the "No Action Alternative" that would allow the lease to expire and require the Army to comply with all lease terms that include the clean-up of these lands. The other alternatives preserve a status quo in which Hawaiian land is bombed, burned, littered and polluted. The status quo is precisely what needs to be changed. Scores of concerned citizens have taken time to express to you the impact of the long-term occupation of these lands and the presence of the US military in our islands. Your study should follow the parameters set by true experts on the impacts of your proposal. Our</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>comments have raised the impacts of the occupation of these parcels, spanning time and space, and your EIS should follow suit. You should evaluate historical harms that would continue should you retain these lands. You should also evaluate the growing cumulative impact that would compound should you continue misusing these lands. Alternative futures that your retention of these lands would foreclose should also be considered.</p> <p>Therefore; the U.S army/military must stop this colonial style theft of state lands at Pohakuloa &amp; other stolen lands across the 50th state &amp; return these lands, (in their virginal conditions), to Kanaka Maoli - immediately. Tihei Maori Ora, Merania Kekaula Sincerely, Merania Kekaula Kahuku, HI 96731</p>	
<p>Roxane Keli'ikipikaneokol ohaka</p>		<p>Dr. Roxane Keli'ikipikaneokolohaka. I provide this comment in strong opposition to the continued military occupation at Pohakuloa. Despite the interwoven attempts to skew toward the preferred option in the EIS, the no alternative -- no action alternative is the only option that should be considered other than no lease renewal period. As it is a first in many steps the military should be taking to begin to rectify your footprint that has manifested detrimental change to landscape, habitat, and wildlife. Allowing continued military activity here further exacerbates the potentiality of severe irreparable harm. Given that we live on an island of interconnected ecosystems and dependencies, we must reorient our thinking and priorities to that of 'āina. How close are we to the point of no return for this 'āina and its people? You argue that loss of state-owned land would result in substantial impacts on training because the army would no longer have access to these critical maneuver areas, et cetera. Perhaps the antiquated assumptive lens of military domination used in your infrastructure planning and design failed to properly consider the perspective of not being on this 'āina eventually. And now the ramifications of that flawed methodology are coming into focus. When you knowingly build a structure on land that is not yours, your lack of access is a direct result of your erroneous decision-making. You frame land retention as a necessary</p>	<p>Please see General Response 1.</p>

Responses to Second Draft EIS Comments

Commenter	Submitted By	Comment	Response
		<p>precedent to the continuation of ongoing activities within a state-owned land retained by the army. The EIS goes on to say that land retention arrangements would happen before the current lease expires so that training is not interrupted; and therein lies a key root of this conflict, the false premise that man supersedes 'āina. The precedent you seek to set and perpetuate is the military's ingrained practice of permanent land destruction and indifference to detrimental impact. 'āina is considered a commodity to you, one that can be disregarded or swapped when it no longer serves you. Your practice is simply to acquire another commodity and move on, leaving in your wake a dead land full of munitions, leaving the community and the state with the burden of cleaning up your mess. We can look through your historical record in places like Kaho'olawe, Makua, Kapūkakī to recognize your disingenuous rhetoric of being good neighbors and stewards of 'āina. But God forbid the health and wellbeing of land and its people interrupts your training schedule.</p>	
<p>Roxane Keli'ikipikaneokol ohaka</p>		<p>But in fact, PTA has irrefutably and severely compromised the integrity of our 'āina. You further state that this alternative could result in the need to move, pololei, correct, you need to leave. The military should consider the no action alternative as preliminary training exercise for complete exit from Pohakuloa. You'll continue to face mounting opposition to your presence here and your continued desecration of our 'āina. You can move your operation somewhere else. We cannot and will not disconnect ourselves from our elder 'āina and our ancestral obligations of guarding and caring for her as the rightful stewards of Hawaii. No military lease renewal, no land swaps, stop the bombing and desecration. Aloha 'āina 'oia'i'o.</p>	<p>Please see General Response 1.</p>
<p>Roxane Keli'ikipikaneokol ohaka</p>		<p>The army's actions and responsibilities under any of the alternatives gives no confidence to your willingness to work to clean and restore Pohakuloa. In fact, under the no action alternative you state, "After the lease expires and, if deemed necessary, the army would follow regulations to determine how and when cleanup and restoration activities would occur. "If deemed necessary" is just</p>	<p>Regarding cleanup and restoration activities, "if deemed necessary" has been removed throughout the EIS.</p> <p>The entirety of the State-owned land, including where live fire currently is not conducted, remains in use by the Army for training activities and is considered an operational range. After training activities cease and the</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>another way of saying "only if we feel like it." Why is any cleanup contingent upon lease expiration and limited to just hazardous classifications? As good land storage shouldn't be -- cleanup be an ongoing practice? You state that the no action alternative will compromise the integrity of PTA.</p>	<p>range is closed, the Army would address MEC through the Military Munitions Response Program, CERCLA, and the terms of the lease.</p> <p>Section 3.5.4 includes several details regarding the current processes and SOPs for maintaining ranges after training events.</p>
Ann M Klaf		<p>Aloha Fellow Humanitarians! I've seen your beautiful peace protest in downtown Hilo for years. I'm grateful to see this every time you put it on because peace is so important and we live in a fearful world full of unnecessary violence and conflict! Life has taken me on a really difficult path where I was ruined in the pandemic as a self-employed licensed acupuncture professional and ended up homeless. Being down and out at this level has helped me to see what my kuleana is at this point in time! I'm someone who has worked their whole life on an inner and outer level and not someone who should ever be homeless, but is anyone deserving of homelessness really? Certainly not in a loving and peaceful world! I've taken the time to write the department of human services regarding many of the issues that have affected me because they are violating Title 18 U.S.C statute 242 Deprivation of Rights Under Color of the Law. Everywhere I seem to go someone is trying to deprive me of the freedoms awarded in the Constitution. As you know, the oppressors have infiltrated the USA a long time ago, but the time to speak out now is more important than ever after this gross pandemic! The story is attached and explains what occurred for me after the pandemic mandates stole my freedom and essentially deprived me of the right to work for myself when they forced me into dependency on government checks! This letter is about a lot more than just my story and is very powerful. I thought you might appreciate reading this one as humanitarians yourselves! This letter was delivered to the DHS offices this last Wednesday on May 29, 2024. Still waiting to see if anything comes of this, but at least I was able to speak the aloha and truth and pass this on! The aloha spirit is telling me this would be sent up the ladder</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>to higher officials given the crimes reported here as the DHS office would be required to report this. Thanks for taking the time to read and connect! We have to cheer each other on for our individual efforts to make this world a better and more loving place. There is so much that is messed up here from centuries of diabolical world "leaders" who aren't caring to the populace and have created endless cycles of generational trauma! Mahalo!</p> <p>Ann M Klaft, L.Ac, MSOM, Dipl. Ac</p>	
Anya Klepacki		<p>Please do not renew the lease to the army for training. Please stop the bombing of the land -- this in itself IS a horribly destructive environmental impact. It should go no further.</p>	Please see General Response 1.
Ronald Kodani		<p>Okay. Good evening. My name is Ronald Kodani. I'm an officer for the Piihonua Hawaiian Homestead Community Association about five minutes away. My concern is my son was the UXO technician for about a year, year and a half, and what bothered me is the military or our government knew that much of these lands in Hawaii is basically poisoned because all of this unexploded ordinance. And -- and what really scared me is he -- he told me that some of the things that they found in I think was by Parker Ranch was -- Willy Pete, white phosphorus. And in basic training I saw what it does and that really scared me for my son. And so I encouraged him, "Get out. You know, the pay was great, but you'll be a mess if you ever hit this." I also found out that in homestead community at Maku'u , that they have people living there and only later on they found out there's still unexploded ordinance. And, you know, it's quite prevalent among all the homestead communities throughout the state, because I belong in another organization called SCHHA, Sovereign Council of Hawaiian Homelands, which about 48 homesteads throughout the state. And all of them got stories about places they know where munitions was exploded but was never cleaned up. And -- but I go back to Kaho'olawe, that island was populated with people before, I believe about 3200. And -- and -- and one of our members here sitting in the audience was one of the</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
Ronald Kodani		<p>protestors. And I think to myself, "That's since World War II and we still haven't cleaned it up."</p> <p>So whatever promises you made, my concern is will they clean up Pohakuloa after? So -- because I'm speaking for the Hawaiian community because my beautiful wife there is a Native Hawaiian. And as you know, there are so many homestead, I mean, wait listers on this -- on this island alone. We have -- if you're not aware, Hawaiian homes has 48,000 acres at Humu'ula; right below is Piihonua, which is 8,000 acres. And we have plans for there, but we're sort of concerned that who would want to live there if you could be listening to munitions going off, you know? And believe me, you -- you -- you know, I'm sorry, but I'm a proud vet. You know, Vietnam, I volunteered. I wasn't drafted. I volunteered knowing I could have gone to Vietnam. I was happy I got sent to Korea instead. Anyway, thank you for your time.</p>	<p>Section 3.5.6 describes the cleanup activities to be performed on any State-owned land not retained. In accordance with the lease and under the provisions of existing law, the Army retains responsibility for cleanup of closed ranges (i.e., State-owned land not retained). After the lease expires, the Army would follow federal law and regulations to determine how and when cleanup and restoration activities for hazardous substances and MEC within the State-owned land not retained would occur under the CERCLA process.</p>
Kris Kosa-Correia		<p>I have lived in Hawaii since 1955. First in Kailua, Oahu then Honokaa, Hawaii from 1996 to the present. I 100% support the military in the Pohakuloa Training Area, as well as all other bases on the other Hawaiian Islands. I would hope all other citizens of Hawaii would also see the importance of the training that happens with our military, as well as all the other important tasks required to have a ready military to support our country in an ever more unstable world of countries in conflict. The military presence is paramount to the safety of our islands as well as our strategic location in the Pacific.</p>	<p>Please see General Response 1.</p>
Shana Kukila		<p>You know, I was taught by one of my kūpuna that you can add to your recipe but you cannot subtract. So once you poison our air, once you poison our water, hewa loa. So we ask you today, one of the things that we hope that you will do is get your risk assessment updated, like uncle said, with (inaudible), right? All these things that you're overlooking is dire to us. This is really important stuff for our health and safety. It's one thing for the military to be a defense for the nation, but why are you going to destroy your home in the process? You know, this is our home. This will be our home for generations. It's been our home for generations. The military is a visitor. They need to</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>clean up their chemicals that they bring to our pristine land. We don't have nuclear weapons in Hawaii bombing on our mauna just out there in the open. That's not what Hawaii is about. So what we're doing here today is standing up for our 'āina and our future and as well as today. So kalamai if we're all sounding very angry, but you would be upset too if your home was in danger like this. Kalamai. Mahalo.</p>	
Shana Kukila		<p>Aloha nui. My name is Shana Kukila. I live here in Hilo on the slopes of Mauna Kea. And I wanted to get to the -- kind of like to the heart of a lot of our concerns is the mini nuclear weapons that are being used on Pohakuloa and there still hasn't been a proper assessment. In your folks' DU assessment, there is one word that is over and over said, "uncertainty. Uncertainty." So if you're uncertain, if these mini nuclear weapons -- the Davy Crockett M101 is a mini nuclear weapon. If you're firing those off up mauka, the wind is coming down to makai. It's only natural mauka to makai science. So what -- I wrote an article of over 10 years ago in the Big Island News about all of this. And one of the things we're hoping is that the military would address this DU downwind issue because the uncertainty is the same thing at Red Hill. Uncertainty about jet fuel, there's uncertainty now about DU effects and the nuclear weapons used on our mauna, our sacred mauna above our water table.</p>	<p>Sections 3.5.4.12 and 3.6.4 describe the Army's past use of depleted uranium munitions at PTA, which were used in the Davy Crockett Weapon System between 1962 and 1968. Sections 3.5.4.12 and 3.6.4 also discuss the Army's 2009 air quality monitoring program, which concluded that depleted uranium had not impacted air quality at PTA or in the surrounding area. While the Davy Crockett Weapon System was capable of firing a nuclear projective (M388), only a high-explosive filled practice projective (M390) and 20-millimeter spotting round (M101) were fired at PTA. Regulations prohibit the current use of depleted uranium munitions in training.</p> <p>Sections 3.5.4.11 and 3.5.4.12 describe the lack of mobilization of munitions constituents, including depleted uranium, within soil, groundwater, and surface water. The text notes that risk of contaminants mobilizing is not a concern as limited surface water and groundwater pathways on the State-owned land pose minor potential impact to soil and groundwater quality.</p> <p>The best available scientific data for groundwater and surface water quality was incorporated into this EIS. Section 3.9.4.6 documents the existing management measures used by the Army to protect water resources. The State Department of Health (DOH) Safe Drinking Water Branch (SDWB) monitors groundwater quality of aquifers as described in Section 3.9. The DOH SDWB has released groundwater contamination maps for Hawai'i Island that show most contamination is along the eastern coast of the island. The DOH SDWB Environmental Health</p>

Responses to Second Draft EIS Comments

Commenter	Submitted By	Comment	Response
			Portal is available at <a href="https://eha-cloud.doh.hawaii.gov/sdwb/#!/home">https://eha-cloud.doh.hawaii.gov/sdwb/#!/home</a> .
	Kūpuna for the Mo'opuna	<p>May 14, 2024 Kūpuna for the Mo'opuna committed to the well-being of Hawai'i for the next generations to come kupuna4moopuna@gmail.com SUBJECT: Army Training Land Retention at Pōhakuloa Training Area - EIS RE: Comments - NO EXTENSION. NO RENEWAL. NO NEW LEASE. NO NOTHING. We, Kūpuna for the Mo'opuna, a network of native Hawaiian homestead farmer beneficiaries of the Hawaiian Homes Commission Act from Pana'ewa, Hawai'i, provide comments in strong support of the Army's No Action Alternative in accordance with Council on Environmental Quality regulations. (ES.8.4. No Action Alternative) We strongly support the position that when the lease expires in 2029, the Army must lose all access to the land. No extension. No renewal. No new lease. No nothing. 1.) Describe the current condition of the leased area at PTA subsequent to the August 2019 Hawai'i Supreme Court decision - affirming Judge Chang's 2018 ruling that "military needs to clean up mess and destruction; follow through on your commitments" – along with the measures that have been taken that fully describe how the terms of the existing lease have been satisfactorily fulfilled.</p>	<p>Section 3.5.2 provides the regulatory framework in which hazardous substances and hazardous wastes are stored, transported, reported upon, etc. The section lists federal and state regulations applicable to activities on PTA. Section 3.5.4 provides information regarding the extent of hazardous substances and hazardous wastes within the region of influence. Sections 3.2.4 and 3.5.4 state that DLNR has implemented the Court Ordered Management Plan and site visits are occurring. The Army has received no corrective action requirements from the site visits. In accordance with the lease and under the provisions of existing law, the Army retains responsibility for cleanup of closed ranges (i.e., State-owned land not retained). After the lease expires, the Army would follow federal law and regulations to determine how and when cleanup and restoration activities for hazardous substances and MEC within the State-owned land not retained would occur under the CERCLA process.</p>
	Kūpuna for the Mo'opuna	<p>3.) Describe how the State can meet fiduciary obligations to native Hawaiians and the public to protect the land since it is, in fact, the Army that has left the land in a degraded and hazardous condition at Pōhakuloa and other sites throughout Hawai'i. 4.) Explain how claims that land retention is "necessary" are credible, since the military also claimed Kaho'olawe, the Kapūkakī (Red Hill) fuel tanks, Mākua Valley, Waikāne Valley, and Stryker armored fighting vehicles were all "necessary." <a href="https://www.civilbeat.org/2021/01/the-history-of-u-s-military-pollution-in-hawaii-is-extensive/">https://www.civilbeat.org/2021/01/the-history-of-u-s-military-pollution-in-hawaii-is-extensive/</a> <a href="https://www.hawaiitribune-herald.com/2022/04/14/hawaii-news/ordnance-removal-enters-next-phase-following-9-months-of-scanning-near-waimea-army-personnel-will-begin-digging-for-munitions/">https://www.hawaiitribune-herald.com/2022/04/14/hawaii-news/ordnance-removal-enters-next-phase-following-9-months-of-scanning-near-waimea-army-personnel-will-begin-digging-for-munitions/</a></p>	<p>The State's obligations to Native Hawaiians are outside the scope of the EIS. An analysis of the Army's land use at PTA as it intersects with the public land trust is discussed in Section 3.2, Land Use.</p> <p>Sections 3.2.4 and 3.5.4 state that DLNR has implemented the Court Ordered Management Plan and site visits are occurring. The Army has received no corrective actions from the site visits.</p> <p>Chapter 1 provides information on the purpose and need for the Proposed Action (i.e. retention of State-owned land at PTA).</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
	Kūpuna for the Mo'opuna	2.) Describe the detailed plan to clean up debris and toxins at PTA before the lease expires. Explain how this plan will differ from the long documented history of military pollution throughout Hawai'i.	<p>The entirety of the State-owned land, including where live fire currently is not conducted, remains in use by the Army for training activities and is considered an operational range. After training activities cease and the range is closed, the Army would address MEC through the Military Munitions Response Program, CERCLA, and the terms of the lease.</p> <p>The current status of range management activities regarding hazardous substances and hazardous wastes is discussed in Section 3.5.4. Section 3.5.6 describes the cleanup activities to be performed on any State-owned land not retained.</p> <p>Section 3.5.2 revised to add the definition of operational ranges.</p> <p>Section 2.1 states that after expiration of the current lease, the Army would follow federal law and regulations to determine how and when cleanup and restoration activities for hazardous substances and MEC within the State-owned land not retained would occur under the CERCLA process.</p> <p>Section 3.5.6 revised to clarify that following completion of lease compliance actions and cleanup and restoration activities, the Army would remain responsible for disposing of any MEC that is incidentally found on the State-owned land not retained due to the DoD's live-fire military training at PTA.</p>
	Kūpuna for the Mo'opuna	7.) Provide a complete disclosure of past history and current information on Depleted Uranium (DU) at PTA, e.g., Army not accounting for DU, Army questionable air monitoring of DU, Army unauthorized activities with DU, Army proposals to avoid Nuclear Regulatory Commission (NRC) oversight, Army documents with misinformation on DU, and possible Army contractor DU bias.	Sections 3.5.4.12 and 3.6.4 describe the Army's past use of depleted uranium munitions at PTA; results of air, water, and soil sampling events; the Nuclear Regulatory Commission permit; and health risk conclusions.
	Kūpuna for the Mo'opuna	9.) Explain and describe the Permissible Sound Levels of the PTA aircrafts when flying over Hawaiian Homes Commission Act agricultural/residential homestead	Hawai'i State Department of Health permissible sound levels are presented in Table 3-21, and additional categories for community noise exposure is presented

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>communities of Pana?ewa and Keaukaha and the plans to address aircraft noise pollution, especially at night. Include descriptions of “sometimes loud” noises of “essential training activities at Pōhakuloa Training Area (PTA) in March [2022] that may be heard by surrounding communities.</p> <p><a href="https://www.army.mil/article/254373/march_training_convoy_and_hunting_advisory_for_pohakuloa_training_area_pta">https://www.army.mil/article/254373/march_training_convoy_and_hunting_advisory_for_pohakuloa_training_area_pta</a></p>	<p>just below that table.</p> <p>The Army completed a noise study in 2020, and manages noise levels to compatible use categories to the extent possible. The study showed that generally not compatible (Zone II) noise levels extend slightly beyond the PTA boundary encompassing forest reserve land.</p> <p>Noise generated by aircraft is discussed in Section 3.7.4 and Section 3.13.4.1.</p>
	Kūpuna for the Mo’opuna	<p>5.) Explain why a \$210 million dollar construction effort to “improve Army facility” at PTA was allowed to begin with the construction of new barracks in light of the lease set to expire in 7 years. Explain why the Army continues to focus on adding on rather than cleaning up as required by law. <a href="https://www.hawaiitribune-herald.com/2022/04/27/hawaii-news/new-barracks-unveiled-at-pta-project-is-part-of-a-210-million-effort-to-improve-the-army-facility/">https://www.hawaiitribune-herald.com/2022/04/27/hawaii-news/new-barracks-unveiled-at-pta-project-is-part-of-a-210-million-effort-to-improve-the-army-facility/</a></p>	<p>The U.S. Government-owned parcel houses the Cantonment (Section 1.1.1 and Figure 3 -1) and is not a part of the State-owned land.</p>
	Kūpuna for the Mo’opuna	<p>8.) Explain the reason for engaging elementary-school aged children and high school minors in activities at PTA with contaminated soil, unexploded munitions and other harmful by-products of live-fire testing (including depleted uranium from some of the ammunition used there, and other chemicals). <a href="https://www.hawaiitribune-herald.com/2018/04/23/hawaii-news/earth-day-at-pta?draws-hundreds-of-students/">https://www.hawaiitribune-herald.com/2018/04/23/hawaii-news/earth-day-at-pta?draws-hundreds-of-students/</a>  <a href="https://www.hawaiitribune-herald.com/2022/05/13/hawaii-news/experience-pta?day-returns-to-showcase-cultural-environmental-efforts-at-facility/">https://www.hawaiitribune-herald.com/2022/05/13/hawaii-news/experience-pta?day-returns-to-showcase-cultural-environmental-efforts-at-facility/</a>  <a href="https://www.civilbeat.org/2019/08/hawaii-has-failed-to-take-care-of-pohakuloa/">https://www.civilbeat.org/2019/08/hawaii-has-failed-to-take-care-of-pohakuloa/</a></p>	<p>Students are not permitted into areas of PTA known or suspected to contain contaminated soil or MEC. The Army completed a 1-year airborne uranium monitoring program in 2009 to determine if depleted uranium has impacted local air quality. The monitoring program collected 210 air samples from three sites upwind and downwind of PTA to provide a basis of comparison. The monitoring program concluded that the depleted uranium had not impacted air quality at PTA or in the surrounding area because the total airborne uranium levels in the collected particulate matter samples were within the range of naturally occurring uranium in Hawaiian soils and rock and were several orders of magnitude below U.S. and international chemical and radiological health guidelines. See Sections 3.5 and 3.6 for this and additional information on depleted uranium.</p>
	Kūpuna for the Mo’opuna	<p>In closing, we reiterate that the military must clean up its mess at Pōhakuloa before leaving, never to return, when the lease expires in 2029. We will continue to stand in protection of our Hawai’i for the well- being of us here</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		today and for the next generations to come. Kūpuna for the Mo'opuna Pana'ewa, Hawai'i	
	Kūpuna for the Mo'opuna	6.) Explain and describe the analysis of fire impacts and the serious concerns about staffing and equipment, and the history of several past fires. Include in this a complete disclosure of all records pertaining to the July/August 2021 upper Ke'amuku / Waikoloa/ Pu'ukapu brush fire, the Big Island's largest brush fire, which coincided with PTA training.	In accordance with DoD Instruction 6055.06, DoD Fire and Emergency Services Program, and the PTA Integrated Wildland Fire Management Plan, PTA firefighters respond to all fires on PTA lands and within the Army's Area of Responsibility. Per the Memorandum of Agreement between the Army and the Hawai'i County Fire Department, signed December 22, 2014, the Army is the primary responder to all fires within the PTA Area of Responsibility, which includes all areas within 25 road miles from the PTA boundary. PTA personnel implement procedures for prevention and suppression of all fires, including wildfires, in accordance with the Integrated Wildland Fire Management Plan. Section 3.16.4 was revised with additional information regarding PTA's fire department responsibilities additional information on historical wildland fires that have occurred on State-owned land and a table has been added summarizing historical fires documented on State-owned land since 2012. Section 3.3.4 has been updated with more recent scientific data and surveys. Wildland fire analysis in Section 3.3.6 has been revised. Mitigation measures the Army would consider include: (1) a multi-year research project to identify possible biological controls in the native range of C. setaceus (fountain grass); (2) installation invertebrate surveys; (3) an ungulate impact assessment; (4) negotiation of an agreement with the State to monitor wildfires on land not retained; and (5) implementation of additional thermal technology. These mitigation measures have been added to the Mitigation Measures subsection. The July/August 2021 fire started near Mana Road in the town of Waimea, and burned mostly within Parker Ranch and also some of the Keamuku Maneuver Area. This fire did not start at PTA and was not related to military training.
Kealani Laamaikahiki		I am Kealani Laamaikahiki. I am Kānaka Maoli. I am also kūpuna. I'm also a grandmother of 17 mo'opunas and one great. I'm not going to stand up here and attack you gentlemen in the green suits because it -- you just a body	Please see General Response 1.

Responses to Second Draft EIS Comments

Commenter	Submitted By	Comment	Response
		<p>of the snake, you know what I mean? But I will tell you, you can take this message to the head, Kānaka Maoli is coming. We're going to put a stop to all of this. Pau already. Pau. Mahalo.</p>	
<p>Kehau Laamaikahiki</p>		<p>Mahalo. Gentlemen, you're in Hawaii, when we say aloha, aloha back. Okay. I grew up as a great American. My father, they called him Top. He did an infraction in Honolulu as a 17-year-old, the judge said, "Go to jail or join the army." Guess what he took? The army. I was a proud American. Red, white and blue apple pie. I pledge allegiance to the flag. Your flag. "My country it is of the..." Guys, you know this, the route, the routine we were taught, the propaganda. I was 40 years old before I found out I'm not an American. That we're occupied by American system. Talk about mind trips, you know, I'm like, "What? I'm not an American?" So I'm in the process, still in the process of learning well who the hell I am. I know who I am. I know where I live. I used to respect the military. Before I go on, can we take a minute -- a second out to aloha and mālama our neighbors, friends in Maui at this moment who are doing the same thing because the Air Force is proposing seven telescopes on top of Maui Space Force. So let's talk -- let's pule, send up our aloha to our neighbors in 'Ohana. Enough. And another thing that offends me is that dumb commercial. You take this to the head, like she said, my sister said, take it to the head that that commercial, kānakas in the native garb, running, running, running and then they transform into these military, how offensive. It's very offensive. Tell your boss. I don't know if I introduced myself. I'm sorry, guys. E kala mai. My name is Jerry Kehaulani Laamaikahiki. I'm grabbing my 'Ohana name. I never knew that was my name. I'm 65 bloody years old guys and I'm finding out. So imagine my children. I've had -- my kids are from 20 to 45, 6, spread along. So the older ones grew up American. The babies, "Mom, they're telling me to do the pledge allegiance." "Oh no, you -- oh, no, no, no." I'll go down to the school, "Do not make my child pledge allegiance to this country and flag when there's no meaning. It's not going to be practiced here in our house." I respect your</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
		country. So you need to go to your country and do your thing, your practices. I guess the bottom line is, no. No come make dirty, no pilau our house. Enough already. Mahalo, gentlemen. I know this is not a good spot for you right now. You should have had your generals here to take this shit. Sorry.	
Francesca Lam		Give the land back to Hawaii. You've spent the last 65 years causing detrimental damage to the land and surrounding areas - not nice!!! Let the people of Hawaii have their land back and fix up the land to allow for their tourism to thrive!!!!!!	Please see General Response 1.
Ernesto Lau		Great work. Regardless of how I feel about the action, this is a very thorough, if sometimes hard to follow, document. The Army should be commended for this effort.  Maybe the cost of any future lease should be offset by any funds the Army spends for biological and cultural conservation on the leased lands and nearby State lands?	Please see General Response 1.
Geoffrey Lauer		I firmly support the continued uses of the Pohakuloa Training Area in it's current configuration.I believe US security requires suitable training facilities for the men and women serving our nation.PTA fits that requirement!	Please see General Response 1.
Christina Lee		The army shouldn't renew its lease. It has been testing and training long enough on Native Hawaiian land, which desecrates not only indigenous land but also destroys the environment. Please consider the incredible cost that the military places on Hawai'i already with other facilities.	Please see General Response 1.
Michael Lee		I am against extending or renewing the lease. Island ecosystems are very fragile and not appropriate for live fire training. The military has been the worst steward of the land in Hawaii - just look at Red Hill. They have given nothing back to the Big Island, While Hilo suffers from crumbling infrastructure (failing waste treatment). The Military turns it's back on helping the surrounding community and doesn't even pay a fair rent. Remember, you are public servants and protectors - you are gifted taxes from the people's hard work so that you can protect us and our land. But instead of protecting, you are putting the ability to live here at risk by polluting the water and bombing the land. We don't want our tax money to be	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		spent destroying our own land - it should be a reasonable ask.	
Brian Legendre		Hello, please return this land to the people who have lived there for hundreds of years. No matter what environmental precaution steps and actions the Army is taking, it will not be as protective of this land as the Army not using this land at all. Thank you.	Please see General Response 1.
Ezra Levinson		Dear Jeff Overton, To whom it may concern: As a person who loves Hawai'i and its people, I am strongly opposed to the US Army's retention of any of the "ceded" Hawaiian state land at Pōhakuloa. I urgently support the "No Action Alternative" that would allow the lease to expire and require the Army to comply with all lease terms that include the clean-up of this land. The other alternatives preserve an unacceptable status quo in which Hawaiian land is bombed, burned, littered and polluted. Scores of concerned citizens have taken time to express to you the impact of the long-term occupation of these lands and the presence of the US military in our islands. Your study should follow the parameters set by true experts on the impacts of your proposal. Our comments have raised the impacts of the occupation of these parcels, spanning time and space, and your EIS should follow suit. You should evaluate historical harms that would continue should you retain these lands. You should also evaluate the growing cumulative impact that would compound should you continue misusing these lands.	<p>Several of the sections in Chapter 3 address the continuation of impacts based on retention of the State-owned land. These impacts are identified in the EIS as "continued" impacts.</p> <p>Past/historical harms (e.g., feelings of inequity and a sense of being unfairly burdened by the Army) are addressed in Section 3.11.4.2. Continued and new impacts on communities with environmental justice concerns are presented in Section 3.11.6.</p> <p>Section 4.4 (Land Use, Historic and Cultural Resources and Cultural Practices, Noise, and Environmental Justice) refined to better describe cumulative, generational impacts on Native Hawaiians and the public from past PTA actions, the Proposed Action, and present and reasonably foreseeable future actions.</p>
Ezra Levinson		To whom it may concern: As a person who loves Hawai'i and its people, I am strongly opposed to the US Army's retention of any of the "ceded" Hawaiian state land at Pōhakuloa. I urgently support the "No Action Alternative" that would allow the lease to expire and require the Army to comply with all lease terms that include the clean-up of this land. The other alternatives preserve an unacceptable status quo in which Hawaiian land is bombed, burned, littered and polluted. Scores of concerned citizens have taken time to express to you the impact of the long-term occupation of these lands and the presence of the US military in our islands. Your study should follow the parameters set by true experts on the impacts of your	Please see General Response 1.

**Responses to Second Draft EIS Comments**

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		<p>proposal. Our comments have raised the impacts of the occupation of these parcels, spanning time and space, and your EIS should follow suit. You should evaluate historical harms that would continue should you retain these lands. You should also evaluate the growing cumulative impact that would compound should you continue misusing these lands. Alternative futures that your retention of these lands would foreclose should also be considered. Land Back. Sincerely, Ezra Levinson Kailua, HI 96734</p>	
Ezra Levinson		<p>Alternative futures that your retention of these lands would foreclose should also be considered. Land Back. Sincerely, Ezra Levinson Kailua, HI 96734</p>	<p>Section 5.6 of the EIS discusses the foreclosure of future options under both lease and fee simple title.</p>
Danny Li		<p>Aloha. My name is Danny Li, L-i is the last name. I live in Puna. I'm 77 years old, so I've been around the block. And I also got a degree from history from the University of Hawaii. So a lot of things that I'm going to say comes from that knowledge; and so it's not just, you know, somebody's mind. I'm not going to mince words. It might sound harsh some of the things I'm going to say, but it's not because I don't have any aloha for the men and women who choose to serve the country, but I have no aloha for the mission of the US military because you know what the real mission is? If you really be honest and look at history, the mission, and in fact even today, it -- it remains, it's a self-appointed role as world policemen. That's what the military does. It isn't to defend people here or the interest, not at all. In fact, there was no alohas from the beginning from 1893 when the military overthrew a neutral and independent government. And of course it's been occupying Hawaii ever since. So there is the mission that you need to understand. And in fact, unfortunately, the US government learned from that ridiculous mission in 1893 and then apply it to elsewhere, everywhere since then. In fact, if you look at history, that - - Hawaii was the first example how the US use this idea of regime change or proxy wars, okay? So to this day we have proxy wars. In other words, US tries to -- if it can do it, it'll try to get other people to fight, you know, whoever the imaginary enemy is. In fact, if you read again in the news, both Republicans and Democrat, people in Congress</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>have said, "Look, the only reason we're fighting in Ukraine is because we want them to fight so that we -- we don't have to fight the Russians." They said that. This is all in print. This is not something I made up. So please really read and, you know, redo -- redo your research in history because in the United States, unfortunately, because of the corporate media, we live in a media cocoon. The rest of the world already see what the United States is doing, okay? So every time, look at the United Nations, the US has to use veto power because it was isolated. It would refuse to -- to -- to -- to talk about peace or ceasefire; instead, it continues to ship bombs and -- and, you know, everywhere in order to -- to cause more and more genocide. And -- and just to -- just to -- just to close, these are not just, you know, my harsh words not only come from me. I'll just quote two very famous Americans who -- who said this in history. 1961, when President Eisenhower left office, do you know what he said in his farewell address? He said, "Actually, the biggest threat to the democracy of this country is the military industrial complex." That's what Eisenhower said. And that was 63 years ago. And it's gotten even much, much worse. Now it's a trillion dollars every year going to war preparation. And in fact we're inventing enemies. A couple weeks ago, I think Washington Post had -- had, you know, had an article interviewing some of the people training telling -- Marines training up in Pohakuloa and they're asking, what are they doing? They're saying, "Basically, we're trying to train to fight a war with China." How ridiculous is that? If you -- again, we live in a media cocoon. If you listen to the people, the Chinese leaders, the Russian, they never said they wanted to attack the United States. They never said that they wanted to take over as number one as the world policeman. Read what they say, they say, "We want to be a more peaceful world so that it's a win-win, mutual sharing." Read their words; don't listen to the media. The media is all -- all, you know, the mouthpiece for the Pentagon. So I would just say -- oh, the second famous American who said also, unfortunately, in 19, I think, 64, Martin Luther King and that was during the height of the</p>	

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>Vietnam War. And you know what he said? These are his exact, "The greatest purveyor of violence in the world today is the United States government." And that was 63 years ago. And maybe in fact the reason he said it, shortly after, he got assassinated. Okay? So my final words is this, if you're seriously -- if you're serious about really defending the security and safety of the people of Hawaii, just clean up, pay up, and move out. 'A'ole imua.</p>	
<p>Danny.H. C. Li</p>		<p>Comments on PTA EIS, 2bd Draft</p> <p>A) Critically, Hawai'i County Resolution #639-08, passed on July 2, 2008, has an 8-point action plan to stop live fire, conduct a comprehensive and independent testing and other actions to demilitarize PTA. The US Army has not implemented any single one of those provisions, nor even offered to negotiate on any of those itemized actions. This is a blatant violation of the most fundamental democratic process of the nation. Hence, this omission alone constitutes ground to cancel the existing State lease and any proposed renewal requests.</p> <p>B) Reputable groups like Veterans for Peace and several other environmental organizations have meticulously detailed the record of the US Military as the largest institutional consumer of oil and emitter of CO2. Again, this horrendous record shows that the US Army is an inappropriate steward of Hawai'i's Aina. The only beneficial option is to: Clean Up, Pay Up and Move Out!</p> <p>Peace and Imua!</p>	<p>Please see General Response 1.</p>
<p>Brenda Lima</p>		<p>I write in strong support of the No Action Alternative. I don't want to see a future where the economic justification for using these lands is that Hawai'i relies on military defense spending. I don't care that the military currently relies so heavy on using these lands, I don't think that is a strong enough reason to continue using them. I don't agree that the No Action Alternative has significant adverse impacts for biological resources and socioeconomic</p>	<p>Please see General Response 1.</p>
<p>Troy Lincoln</p>		<p>Response to draft EIS for utilization of Pohakuloa Training Area RESOLUTIONS Immediate/Short Term: Stand down full</p>	<p>Please see General Response 1.</p>

Responses to Second Draft EIS Comments

Commenter	Submitted By	Comment	Response
		<p>munitions loads on the live fire impact range at Pohakuloa. For Live fire STX training, utilize simunition rounds and/or MILES systems. Utilize MILES for STRAC lanes for individual weapons qualifications with M9 and M4. There is an overwhelming danger to the aquifer being irreversibly destroyed and/or contaminated. If that occurs, the source of life will be eradicated for ALL people utilizing the land, not just Kanaka Maoli. I would like to see the government start taking proactive measures to mitigate these risks instead of reacting to them after the fact when damage is done, damage which may not be able to be recovered from a fiscal standpoint or from a material standpoint. The government does not have a positive track record for resolving issues with a forward-looking and thinking perspective. The latest greatest examples are Puna Geothermal Ventures and the introduction of the East Indian Mongoose to the 'āina. Munition loads can and should be stood down. A Council of Kupuna should be included for oversight over how the land is utilized and safeguarded. Mid-term: Request R&amp;D funding to develop virtual/simulation training systems to minimize, reduce, or eradicate impact to the 'āina. Request train-up periods be reduced until mobilization/predeployment notification of sourcing is verified by the National Command Authority. Limit GREEN training to garrison environments until three (3) months prior to mobilization. SUMMATION Native Americans and Micronesians have also been dispossessed of their ancestral land, but the overriding difference is that Hawai'i was a sovereign monarchy that was overthrown by individuals who were directly accountable to the federal government. Whether this was a conspiracy with the full knowledge of the federal government or not is NOT THE POINT. This individual REPRESENTED the government by virtue of his POSITION which makes the federal government partially complicit and completely, 100%, liable in any action taken against a sovereign nation. Former President Bill Clinton's apology resolution was a nod and mere acknowledgment of what was done, but is impotent in the ability to action change of the current circumstance and does not include federally</p>	

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>mandated correction or recourse to the unlawful possession of the land. The Federal Government holds fiduciary responsibility to Native Hawaiian beneficiaries because they have directly and peripherally benefited from the use of the lands which were unlawfully taken from a sovereign government. It is not the responsibility of the State of Hawai'i government to manage these proposed reconciliation programs, and it is irresponsible for the Federal government to assign this responsibility to the State of Hawai'i government. The State of Hawai'i has mismanaged and failed their trustee responsibility (i.e., The Department of Hawaiian Home Lands) to Kanaka Maoli, who are beneficiaries of trust lands. This responsibility should fall to a Council of Kupuna who have equitable voice and power to move on actionable items and create policy measures to oversee the trustee relationship. Land cannot be taken, and a people dispossessed of it, without compensation of some kind. Land as a fiscal valuation is a Western concept. Indigenous people, the world over, see the land as priceless because it is the land that supports life and livelihood. We are dependent upon it, every one of us, including our temporary tenants at Pohakuloa. If this is a conversation and that is truly what we are engaged in, then actually listen to what the land is saying. Organizations, such as governments, which are in positions of power and authority to make choices on behalf of their interests are free to do so because they hold that power. They are not free, however, from the consequences and long-term effects of those choices. Long-term, it is in the best interest of the Federal, State, and County authorities to consider carefully their long-term use of the land. Interaction on the land, in brazen and undisciplined fashion, does not yield good long-term consequences. Poor land management leads to the abandonment of previously used sites that still await reconciliation by the mismanagement and poor stewards of those areas. Areas such as the Formerly Used Defense Sites of Waikoloa awaiting Unexploded Ordinance disposal so those sites can be reutilized, Former telescope sites that have been</p>	

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>decommissioned, yet not dismantled according to the terms of the lease. These lands were indiscriminately used and managed with poor foresight and when the cost to recover them proved untenable and above what they were willing to fiscally dedicate to recover them, they were just left abandoned. I don't hold the current policymakers responsible for the past poor choices, but I absolutely unequivocally hold them responsible for the perpetuation of those past choices. Turning a blind eye or feigned misunderstanding of the issues is a pretense and facade. If you are here now in this conversation, you are released from ignorantly continuing on in destructive choices affecting the land and called upon to make choices that will sustain the land so ALL PEOPLE may use it with wisdom, temperance, and prudence. It is particularly my standpoint that this conversation cannot be used in any way during an election year to sway votes in the direction of a political party or candidate, but that this conversation be done solely for the healthy recovery of the 'āina and the protection of all our limited and shared resources, and for no other agenda than that. A variety of stakeholders desire usage of Pohakuloa in some manner. It's a rhetorical statement that we all can agree upon. The primary stakeholders—those who reside on the island, have heritage, or past and future genealogical ties—have the greatest long-term risk. Those who don't have an everlasting connection to the land, who are temporary tenants on the land, don't have an innate desire to protect the land. This is not meant as an insult to their honor or their heart. It is a natural consequence of this not being HOME to them. The 25th ID Commander will eventually leave, like the USARPAC commander, and the President of the United States. They are filling temporary vacancies to which they have been appointed, and once that term is fulfilled, they will move on to other kuleana at other locations around the world. The people who live on this land, who are the stakeholders, who have to contend with the long-term effects of decisions made by those who are here for a short time, creates an inequity in the power behind that decision-making. There is a clear and imminent</p>	

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>danger to the aquifers by continued bombardment of the Pohakuloa area. The Department of Defense has a poor track record of land management for military operations. The pattern historically, at every military site I can think of, has been to overuse and wreak havoc on the land until it has been rendered useless and/or unsafe, at which point the resolution becomes abandoning the land. That is a threat to the National Security of the United States from a long-term perspective. Kaho'olawe is a prime example. The current administration wasn't in office when these decisions were made, but they and the current leadership are now. Use your authority to reverse the devastating and short-sighted decisions of the past. If it is true, at this point in the conversation that all we can agree upon is that we all want to use the land at Pohakuloa for something, can we agree that it is much wiser, prudent, and beneficial to everyone who considers themselves a stakeholder of some sort, to utilize it so that the coming generations—my children and your children—won't have to correct the mess that has been made through repetitive foolish policy-making? If you want to utilize the land and for the land to remain viable for future generations, for those who live here and for the defense of the nation, revisions in how training is conducted need to be addressed. Not lip service, but actual discussions with oversight counsels with Kupuna selected from the Native Hawaiian community. That is owed to this people at the very least and not a far stretch for the government to make that allowance in good faith.</p>	
MeleLani Llanes		<p>To Whom It May Concern,</p> <p>In 1976, George Helm, Kimo Aluli, Walter Ritte, Emmett Aluli, Ian Lind, Ellen Miles, Steve Morse, Gail Kawaipuna Prejean, and Karla Villalba took a stand to save Kaho'olawe from the relentless bombing by the U.S. military. And finally it stopped. How shocking that the military thought it appropriate to bomb on Moku O Keawe at the Pōhakuloa Training Area.</p> <p>The U.S. military repeatedly destroys our natural resources and has never been welcome in Hawai'i.</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>No EIS will make you welcome here. Your lease is up soon and you need to leave, and restore all that you destroyed. You have stolen so much land in Hawai'i and have disrespected our cultural practices and places of importance.</p> <p>You are not welcome here and need to leave. Sound repetitive? Just making sure you are understanding my message.</p> <p>Mahalo for allowing the opportunity to share our comments.</p> <p>MeleLani Llanes Makakilo, O'ahu</p>	
Connor Logsdon		<p>I oppose this with all of my being. The damage that military weapons testing has on the environment is everlasting. It is disgusting and immoral. This needs to stop.</p>	Please see General Response 1.
Joy Loo		<p>Aloha, name is Joy Loo. I am a resident of Hilo, Hawai'i. And I am testifying, on behalf of myself, my children, my grandchildren, and my great grandchildren. I am against the military retaining space at Pōhakuloa Training Area. You have proven to be bad stewards of the land. You have proven to be bad neighbors. Every time I drive past Pōhakuloa Training Area, all I can think about is how you treat the land is how you treat the people. And that's so accurate in so many ways. I also remember that when Mauna Loa erupted how Hawaiians put ho'okupu to draw the lava to Pōhakuloa. There was also a poll online about whether or not people wanted the lava to take park lower training area. 94% of people who responded wanted Pōhakuloa to be taken by lava. We, as a community, do not support you because you, as a community, do not support us. My phone number is [REDACTED]. Mahalo.</p>	Please see General Response 1.
Stephen Loo		<p>My name is Stephen Loo. I live in Hilo. I am calling on behalf of myself and my family. You people are not good stewards of our land. You've already have a history, the military has a history, of destroying one island and breaking its water table. You don't belong up at Pohakuloa. You have millions of acres in America. That's where you should be doing your so-called needed</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

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		<p>practice. During last year's RIMPAC, I was driving over the saddle highway that runs near, adjacent to Pohakuloa. and I witnessed a rocket flying overhead across the highway as I was driving home from Kona to Hilo. You're dangerous. You already admit to having unexploded ordinances and radiation. We don't want you here. You need to get out. You need to leave.</p>	
Ruth Love		<p>I wholeheartedly approve our U. S. Army Training Land Retention at Pohakuloa. Thank you for all of the Army's assistance with fires and vehicle collisions too. Also, greatly appreciated the way you all helped with the Mauna Loa eruption. God bless you all.</p>	Please see General Response 1.
Kaila Lu		<p>NO. You will NOT renew your lease on crown lands. KANAKA + LOCALS ARE TIRED of having you desecrate our precious island. The US military continues to be a threat to our environment, our water + the livelihood.</p> <p>WE NEED YOU TO CLEAN UP YOUR MESS FROM THE LAST 70+ YEARS AND GET OUT.</p> <p>Our aina needs rest. You have come here like a disease and destroy everything you touch. You are not welcomed.</p>	Please see General Response 1.
Alix Lunsford		<p>Do not extend the US Army lease of Hawaiian land. The land is so precious and cannot endure anymore destruction. Leasing over 20,000 acres for 65 years of destruction is absolutely heinous and needs to end now. Imagine how many useful &amp; beneficial ways this land could be used.</p>	Please see General Response 1.
Heather Lyman		<p>The time has come for humans to realistically address the impact of our actions on our environment and to mitigate unhealthy outcomes with more appropriate choices, even if that means a drastic adjustment to our usual and customary programs. Pohakuloa has long been detrimental to the health of Hawaii's citizens as well as Hawaiian culture. It is not sustainable to continue using this land for military training and experimentation. We know better, so we must DO better. Ends do not justify the means. We disrespect our own descendants when we desecrate the land. While authorities plead that Pohakuloa ensures public protection and safety, public health (physical and</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

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		mental) is severely impeded by Pohakuloa activities....and now the public pleads: do not renew this lease.Please do the right thing, clean up spent and unspent ordinance, vacate the Saddle and return this land to the people.	
Hafiya M		Please give back this land to the native hawaiiins. You are poisoning the environment with this military training and harming fragile ecosystems. The native Hawaiians have been oppressed and harmed long enough by the US military. Demilitarize Hawaii.	Please see General Response 1.
Ashleigh MacKinnon		The state of Hawaii is a beautiful natural wonder full of diverse and unique habitats. I oppose extending the military lease on this land because it would further endanger the environment there, as it already has. Bombs and other weaponry being tested there do not just destroy the surface of the earth, but poison it for generations to come. Keep paradise clean, safe, and beautiful.	Please see General Response 1.
Alfred Madeiros		Aloha mai kākou, Alfred Keaka Madeiros ko’u inoa no Wai’anae mai au. To give testimony on this. First and foremost I'm a kia’i ka i iwi, ka i ‘āina, ka i kupuna, ka i keiki. And I am one of two selected Native Hawaiians as a part of the CRI for Kapukaki, Red Hill. Somebody that's all about ‘āina, the mālama ‘āina, aloha ‘āina. I find it completely disheartening to even have to do this process right here, where we have to call up, or we have to attend these meetings, where we have to show up hold signs, go into the Senate offices, going to the Representatives’ offices, emails after emails, and calls after calls to let people know that we need to stop the desecration of our ‘āina. Whether it's for Pōhakuloa, whether it's Mākua, we already see what happened at Kaho’olawe. Enough is enough. There shouldn't be no more renewal of any leases. They haven't done anything for the betterment of the people of Hawai’i, for ‘āina. They've only destroyed everything that we love; everything that our ancestors have given their life to protect, you know. How many more of us will have to die until the government, or whatever type of committee or group starts to listen to the people of this land. How many more people have to be poisoned! How many more people have to be pushed away from our own home because of this type of stuff.	Please see General Response 1.

Responses to Second Draft EIS Comments

Commenter	Submitted By	Comment	Response
		<p>You know, the military doesn't only cause harm to our land. It causes harm to the people. The natives of this land. Most importantly. So as a kanaka maoli, as somebody like I said, that's all about 'āina that's an aloha 'āina to steward to the land. It is our kuleana to protect our home, to preserve what we have, to ensure that our natural resources are unbothered, unharmed. So I say 'a'ole to any type of agreement with the military. 2029 no longer needed any of the military. Demilitarize Hawai'i, no new leases. And it's time to put kanaka back on the 'āina to restore it, to restore the ahupua'a system; to ensure that our keiki and future generations have a place to call home. But also understand that we come from this land, we learn from this land, and we can live off of this land. Mahalo nui for your time, mālama pono.</p>	
Prana Mandoe		<p>Aloha. Aloha. Okay. Aloha kakou. My name is Prana Mandoe. And first I'd like to thank all of the kupuna, the makua, and the opio who have been here since long before I was born protecting 'āina. So I'd just like to humbly add a few comments to what's been said this evening, knowing that this is part of hundreds of years of testimonies. I support the no action option related to the end of the US Army lease at Pohakuloa. The lease on state land should expire because the lessee, the United States Army, has been a poor tenant and comes from a larger organization, the United States Armed Forces, which also has a consistent history of being a poor tenant. If we even look at it in the most simple colonial rules, you don't renew a lease with a lessee who trashes your house or your 'āina. It's very simple. I don't need to read, although I would like to have the time and do it, but I don't need to read a thousand pages of -- pages of the second draft EIS statement to know because I simply observe it by driving over Saddle Road through Pohakuloa and watching the helicopters drop bombs and watching the dust fly up and knowing that this is a process called desertification. It's creating deserts, where if this were not happening, there would be plants that could root, there could be forests that could generate. And by bombing the -- you're destroying the future forests from becoming themselves. I</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

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		<p>understand that there is some conservation work that has begun but that is not your primary purpose. Your primary purpose is war training. And, honestly, we are a target because of the US military's presence in our islands. We are not protected by you; we are threatened by attacks from foreign -- other foreign nations who might come here to take you out just as happened in Pearl Harbor. All right.</p>	
Prana Mandoe		<p>Furthermore, the army coordinates with other branches of government, I heard this in your introduction today as you were speaking, and you coordinate with other branches of military who have further proven failures to meet land use obligations and land conservation obligations. Oh, and I forgot to say, the US Army at Pohakuloa has also been sued for non-compliance with environmental law. I believe it is Kahalelio and Ching versus the United States. The US Supreme Court upheld the facts of pollution and those have not been rectified. They have not been corrected, and yet you're asking for a lease extension. Again, what sane landlord would re-grant you a lease when you are proven by the US Supreme Court to be in non-compliance with the laws you agree to follow? That's insane. Others have spoken today this evening, and we'll say it again, about the other branches of government which you work together with. A prime example is the US Navy responsible for cracking the water table and desertifying Kaho'olawe more than the goats and the ranching to a whole different level where now not only is it a desert, is it full of ordinance, but there's also no water supply in the ground. Yeah, that was a result of bombing, the same action that I have personally witnessed as I just drove across the Saddle Road. Okay? So we know that that's -- that's happening and it's a when. It's not an if. Will you damage the water supply? Yes. If it's not been done already. And of course with Kapūkakī, with the leak of jet fuel into, you know, the Honolulu City drinking water, that is a crime. Please don't commit such crimes here. I strongly urge that you as people sitting in front of us today, that you take it in, that you not only write a few notes and hear it in your ears, but that you let our words touch your hearts and that you would go back and support the ending of the lease and the</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

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Prana Mandoe		<p>proper cleanup and reparations of this 'āina and be true representatives of defense. Mahalo.</p> <p>A second destructive action that is going on done by the US Army at the Pohakuloa Training Area is pollution and damage to Ka'ohe, the aquifer that lies below the land used for war training. It's simple common sense that the military, like any industrial group, only more so, is contaminating the underground water supplies because there are chemicals used for industrial purposes, automotive purposes, for all of the military equipment that you use, for weaponry and even for the simple barracks use sewage. All of those things require chemicals and leaks happen. Yeah, leaks do happen. That's not a secret that they happen. The earth absorbs those leaks and then they don't disappear. The chemicals go down into what's below, which tends to be groundwater known as Ka'ohe. The bamboo -- the bamboo water carrier is what is -- the place is named for to my understanding.</p>	<p>The best available scientific data for groundwater and surface water quality was incorporated into this EIS. Groundwater and surface water quality are discussed in Section 3.9 of the EIS. Section 3.9.4.6 of the EIS documents the existing management measures utilized by the Army to protect water resources. The State Department of Health (DOH) Safe Drinking Water Branch (SDWB) monitors groundwater quality of aquifers as described in EIS Section 3.9. SDWB has released groundwater contamination maps for Hawai'i Island that show most contamination is along the eastern coast of the island. The DOH SDWB Environmental Health Portal can be accessed at <a href="https://eha-cloud.doh.hawaii.gov/sdwb/#!/home">https://eha-cloud.doh.hawaii.gov/sdwb/#!/home</a></p> <p>Section 3.5 Hazardous Substances and Hazardous Wastes presents the existing conditions from current activities at PTA and notes that risk of contaminants mobilizing is not a concern as limited surface water and groundwater pathways on State-owned land pose minor potential impact to soil and groundwater quality.</p>
Keke Manera		<p>We won't let you conduct business as usual until your injustice is corrected!</p>	<p>Please see General Response 1.</p>
Nana-Honua Manuel		<p>Why come -- as Kumu Kalani Flores and Kumu Pua Case said, "Why come?" But as a wise and wonderful kia'i Healani Sonoda-Pale said, "We participate to leave a record just as our kupuna did, who signed the Ku'e Petitions so that our mo'opunas will know of our resistance." As I contemplated attending tonight and considered what I could possibly say that had not already been said repeatedly through history, I began to cry deep, hard, painful, gut-wrenching tears, and I wondered where it was coming from, I realized intergenerational trauma is rooted in never ending trauma. Trauma without an endpoint does not allow for individuals or collectives to grieve properly, and the trauma continues endlessly. As the tears flowed, my thoughts went to thoughts of the strongest, kindest, most generous man I've ever known or</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

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		<p>one of them, my father-in-law, David Maiola Manuel Sr. We lost papa to small cell carcinoma in July of 2000. He ua hala in the most painful, cruel and undignified way here at Hilo Hospital, paralyzed from C4 in his neck down and submitted to endless procedures for three weeks after being diagnosed terminally ill on day 3. David Maiola Manuel Sr. served in the US Army during the Korean War. He was stationed in Japan and he saw the local people digging through the kitchen garbage for food that the military threw away. Papa said he never saw that before in his life. He would wrap up care packages of good food and stash it for those who came to scavenge. All his life, he never wastes food and he fed everyone. In 2013, we learned of the atomic workers settlement. Michael and his living siblings applied. Through that process, we learned that his ohana was eligible for a settlement if papa had even spent 24 hours on a ship down under and later developed small cell carcinoma lung cancer. This cancer was from his exposure to radiation from the atomic bombs that the US military was testing in the South Pacific. Papa was on a ship and he watched behind DOD-issued goggles as atomic bombs were detonated. Papa spent five years down under at Christmas Island, Enewetak, and Johnston Island minus the five one-week visits home each year. So what does a wrongful death settlement from the DOE, Department of Energy, have to do with Pohakuloa DEIS 2.0? Are we lucky that this DEIS doesn't say that the damage and impact at Pohakuloa is so detrimental and so severe that 65 more years won't matter? That we -- that you could just trade some other stolen lands for these stolen lands and then own them free simple forever? Why do we need to distinguish between the different tentacles of the he'e?</p>	
Nana-Honua Manuel		<p>No loss to you as it was never yours to begin with. Please clean up and de-occupy Hawaii while there is still undesecrated 'āina and wai to return to the lāhui who remain steadfast oia'i'o. To be clear, no retention, no lease renewal, no real estate action. Mahalo.</p>	Please see General Response 1.
Nana-Honua Manuel		<p>I am Nana-Honua Manuel. My political national status is that of American citizen as a child born and occupied</p>	NEPA and HEPA require responses to substantive comments. Section 1.6.2 notes that, in determining

**Responses to Second Draft EIS Comments**

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		<p>Hawaii takes on the political national status of her parents. I was -- I live with my Kānaka Maoli husband, Michael, in Waikahekahe Iki, Puna, Moku o Keawe. We have four grown children and seven mo'opuna. My participation in this forum does not constitute my free and informed consent. We listened to last night's Waimea hearing this morning and we struggle with deja vu as we repeated the 2022 hearings. 2024 DEIS is just as deficient or even more so than the 2022 due to the lack of adequate response to the 2022 comments.</p>	<p>whether a comment is substantive, the EIS preparer “. . . shall consider the validity, significance and relevance of the comment to the scope, analysis or process of the EIS (HAR Section 11-200.2-26[a]).” For this EIS, comments that help refine the Proposed Action or alternatives; identify specific resource analysis to be conducted in the EIS (e.g., cultural resources, biological resources, hazardous waste); and/or recommend technical data, specific impacts or mitigation measures were considered substantive. Statements considered to not be substantive were general comments with no specific information, such as those that stated preferences for or against the Proposed Action, military, or Army in Hawai'i.</p>
<p>Nana-Honua Manuel</p>		<p>What does Kapūkakī have to do with Pohakuloa Training Area? Our nephew, the former DLNR Deputy Director of Water, told me that if the Oahu aquifer is contaminated, 1 million people will need to relocate. He said Moku o Keawe is the only island with enough water and land to house them. But what if the aquifers of this island have already been contaminated by Pohakuloa Training Area? Where is the data from the 2015 test well at Pohakuloa Training Area? Why are you still chucking in water? This is my never-ending nightmare that the occupier, the US military, will return the kingdom 'āina and wai to the lāhui when it is all poisoned and uninhabitable like Kaho'olawe.</p>	<p>The best available scientific data for groundwater and surface water quality was incorporated into this EIS. Groundwater and surface water quality are discussed in Section 3.9 of the EIS. Section 3.9.4.6 of the EIS documents the existing management measures utilized by the Army to protect water resources. The State Department of Health (DOH) Safe Drinking Water Branch (SDWB) monitors groundwater quality of aquifers as described in EIS Section 3.9. SDWB has released groundwater contamination maps for Hawai'i Island that show most contamination is along the eastern coast of the island. The DOH SDWB Environmental Health Portal can be accessed at <a href="https://eha-cloud.doh.hawaii.gov/sdwb/#!/home">https://eha-cloud.doh.hawaii.gov/sdwb/#!/home</a>Section 3.5 Hazardous Substances and Hazardous Wastes presents the existing conditions from current activities at PTA and notes that risk of contaminants mobilizing is not a concern as limited surface water and groundwater pathways on State-owned land pose minor potential impact to soil and groundwater quality. Groundwater extraction from State-owned land at PTA is not proposed as part of the Proposed Action. The Army does not have data from a 2015 test well at Pohakuloa Training Area. Section 3.9.4.2 has been updated to include additional information from the Thomas (2019) report. A link to this report has been added to the PTA EIS website</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
			(https://home.army.mil/hawaii/ptaeis/project-home) under the “Documents” tab.
Keith Marrack		I want to express my staunch support for the U.S. Army's proposed retention of approximately 23,000 acres of state-owned land at Pohakuloa Training Area (PTA) on Hawai'i Island. As a concerned citizen who acknowledges the pivotal role PTA fulfills, I firmly believe that the Army's retention of PTA is crucial for the safety of our island community. This is due to its significant contribution to supporting and training the Hawai'i National Guard, local first responders, and law enforcement, as well as its capability to respond to emergencies on Maunakea, Mauna Loa, and particularly along the Daniel K. Inouye Highway.	Please see General Response 1.
Sally Marrack		I am reaching out to express my staunch support for the U.S. Army's proposed retention of approximately 23,000 acres of state-owned land at Pōhakuloa Training Area (PTA) on Hawai'i Island. As a concerned citizen who acknowledges the pivotal role PTA fulfills, I firmly believe that the Army's retention of PTA is crucial for the safety of our island community. This is due to its significant contribution to supporting and training the Hawai'i National Guard, local first responders, and law enforcement, as well as its capability to respond to emergencies on Maunakea, Mauna Loa, and particularly along the Daniel K. Inouye Highway. Sally Marrack	Please see General Response 1.
Keith Marrack		<p>I back the Army's preferred alternative 2. PTA is vital to the readiness of the military in the Pacific theatre. PTA is the only live fire area for large-training units. At the same time the Army protects Archeological and environmental assets on the land. They provide local jobs and training area for local fire, police, and military.</p> <p>I am in favor of a land swap if it is feasible to make the future training area Federal land.</p> <p>If we lose PTA as a training area, much of the military in Hawaii will no longer choose to stay in HI! This will be a big hit to the economy and the island and the state. We need PTA and in order to be effective, they need the state land.</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

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Paul Martin		Should the army continue to be given, not leased, access to lands that are sacred to some and would be a resource for all? Should they be allowed to continue to despoil this land? No. The US Army has enough places to practice their war and test their weapons. They don't need to do it in places where the people's ancestors lived, next to where they live, and where we need their children's children to live. End the lease!	Please see General Response 1.
Shannon Matson		First, I just wanted to apologize to everybody here. Normally, I would not sign up to go so early and I would allow for Kānaka Maoli to speak first, but I do have my keiki with me, so I ask for -- humbly ask for your leniency. This is why I'm going at the beginning but, typically, kupuna and Kānaka Maoli should go first. And it's really hard to start with aloha, which is normally how I would begin, because I have no aloha for the army. I have aloha for many of the individuals involved in the army activities, but the army as an entity, 'a'ole. I'm Shannon Matson. I was born in Honokaa, raised in Kona and ke Akua willing, I will die someday, maybe in about 65 years, in Puna. Both of my keiki were born in Hilo. This is all important information because before I tell you my thoughts on continued desecration and war, I need to share my connection and kuleana to this 'āina. I'm here on behalf of myself and my ohana, but I'm also here in the memory of some of my dear friends and family who have taught me about the military industrial complex and have died before they saw the conclusion of this hewa: Bob Northrop, hey, father, Nelson Ho, Greg Lupton, Uncle Abel. I'm here not just to express my strong support for the no action alternative of no retention of state land after 2029, but I am proposing in addition to this, the reparations be paid to all beneficiaries for the basically free ride that the army got for the last 65 years, along with a comprehensive plan for environmental restoration. No part of the other alternatives are acceptable, not to those who came before me or those who are coming after me. For the record, you, the Army, already own, I'm using this term loosely because you don't legally own it, 84,000 acres and yet you allege that this 23,000 additional acres retention is crucial. For	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>what? Forget it. You already have enough, enough bombs, enough chemicals, enough land, enough death. Lawa ke'ia. Lawa ke'ia, ha'awina loa. I haven't read the document cover to cover because I have children, I have a job, I have a life. It is 526 pages, no, wait, plus an additional 1,974 pages plus 428 pages plus countless resources and other information. It's impossible to read in 48 days or a year or two years.</p>	
Shannon Matson		<p>Number two, not to mention how the community feels, which is the most important, but in all of those pages of -- of testimony and then all of the feedback from the federal, state, and county level, there are multiple entities in opposition or express severe concerns including the EPA, OHA. OHA says this entire process is premature to implement the 2019 deal in our ordered management plan; that hasn't even occurred yet. From 2019, we haven't done that yet. Step one we haven't even done. So how can we move on? Oh, there's so much more, but I'm sorry, I know I went over time. Lastly, I would really like to read, but I know I don't have time, so I'm just going to point out, it's on page 700, for those of you interested, the transcribed message from Colonel -- retired Colonel Ann Wright. So please read her testimony. This is somebody who served in the military for 29 years. She's a retired US Army Colonel. I want this to be entered into the record again in its entirety. I think it should be the first page and I think it should be the last page. And I think there should be a full survey done of current serving military personnel and retired, everybody in the VA that we can get ahold of. And you try to tell me that there are more people who have served in the army who believe that this is necessary because that's what this document says, that this is necessary. But if you ask retired military personnel, they will tell you this is not necessary. It never was necessary and they are not better off for having served in the army. Mahalo.</p>	Please see General Response 1.
Shannon Matson		<p>But in the hundreds of pages I did read, I found a few surprising things. Right on the first page, kala mai, I'm almost pau, highlighted first page, " Executive summary. Military training is discussed only in the context of ongoing</p>	This EIS analyzes the potential impacts from the Proposed Action, which is retention of the State-owned land. If the Army proposes to change its ongoing actions in the future, then separate NEPA and HEPA analysis, as

**Responses to Second Draft EIS Comments**

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		<p>activities and their impacts because of land retention and no changes in training are proposed." In another 65 years, we think no changes are going to occur? It says a separate N-E-P-A analysis will occur in the future . So we're agreeing to something that we have no concept of what that even looks like. In 65 years -- in the last 65 years, how many changes have we seen in military training procedures and protocols and weapons? This is just impossible. I mean, right there it's flawed.</p>	<p>applicable, would be conducted for those future proposed changes.</p>
<p>Shannon Matson</p>		<p>To whom it may concern, As someone who was born and raised on Hawai'i Island, I believe it's my kuleana to protect and help preserve these lands. Everything I have witnessed from the years of abuse and misuse at the hands of the US Army tells me that we need a change and must stand up against continued bombing and live-fire trainings and at the very least demand a reduction if not a total withdrawal from lease lands. I agree with and second the statements below: ·The EIS only looks at impacts on 23,000 acres of state lands, as if what the Army is doing on the other 110,000 acres doesn't have a cumulative impact. It seems clear that any assessment should consider actions on all 132,000 acres. While the Army writes: "State-owned land does not contain active, permanent liquid fuel storage tanks", we might ask are these storage tanks located on federal lands? ·We ask how the Army can say it considered meaningful alternatives - like diplomacy, demilitarization, or even virtual reality simulations - in preparing the 2024 DEIS. These alternatives are said to be listed in a 2017 document, but we cannot find that document and haven't been provided access to it, even after asking. ·The Army's use of conservation district lands for live-fire training is not allowed. Therefore the Army is proposing to change the conservation district rules themselves. We are worried about the impacts of creating a "live-fire training" conservation district. ·The Army proposes to further pollute and contaminate these lands for an unknown number of years. They also presume they will clean up and restore the lands later even though their lease limits clean up to existing technologies and costs that "would not exceed the fair market value of the land".</p>	<p>Please see Sections 3.3, 3.5, 3.4, 3.11, and 4.0 of the EIS for information on biological resources, hazardous substances and hazardous wastes, historic and cultural resources and cultural practices, environmental justice, and cumulative impacts, respectively. Section 2.1.4 details the established screening criteria used to identify the range of potential alternatives that support the purpose and need of the Proposed Action (discussed in Section 1.3). The Army used the screening criteria to assess whether each alternative was reasonable and would be carried forward for evaluation in the EIS.</p>

**Responses to Second Draft EIS Comments**

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		<p>This means that they may not even have a budget to clean up and restore the land. So how will the Army fully clear and restore the lands after their use? ·Four native bird species have been decimated in PTA areas. The Army’s “management measures” for native wildlife aren’t working and the Army must recognize this. o For instance, the Army optimistically speculates native wildlife are “habituated” to sudden explosions and noise. Another US federal body, the National Park Service, recognizes that chronic stressors, like noise, damages wildlife. o Thousands of acres of native plants were burned in an uncontrolled fire in 2018, due to live-firing training on federal lands. How will the Army restore these thousands of acres and prevent infiltration by invasive species? ·The Army, like other militaries worldwide, does not disclose their greenhouse gas emissions (GHGs), stating: “Because there is limited opportunity for locally generated air pollutants to accumulate, additive effects on regional air quality and from GHGs are unlikely[.]” This statement fundamentally misunderstands climate change. ·Hawaiian cultural practitioners are concerned that resources they gather are contaminated; the Army installed physical barriers blocking religious sites; and requiring case-by-case approvals and Army escorts for practitioners curtails the latter’s access. The new CIA recommends “the Army formalize a cultural access request process...” We propose that the Army clean up these areas immediately and allow free access. Permission slips are not an answer for this situation and having to request access from a militarized foreign authority further adds to a collective and cultural trauma that the indigenous people of this land have not been able to heal due in part to the continued occupation of their ancestral and sacred lands. Please do the right thing and work beyond a no-action alternative towards a restorative action alternative that restores the land and helps heal what has been broken. Mahalo, Shannon Matson Hawai’i Island Resident</p>	
Tasman Mattox		Please do not allow the US army to renew their lease on these lands. Please investigate possible other plans for the land in order to protect its natural beauty and cultural	Please see General Response 1.

**Responses to Second Draft EIS Comments**

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noelani mengel		<p>significance to kanaka. If it must go back to them, ensure that the US army pays FULL VALUE for the use of the land.</p> <p>ma'oli'oli plant, or schiedea hawaiiensis, is only found where PTA resides, according to the Center for Biological Diversity. Fires caused by the military's training activities threaten the dry forests where they live.</p> <p>Your purpose and need for PTA you list 3 times that it is because you can use live rounds. You also state that if you were to try to do these exercises elsewhere, you could not due to environmental restraints. Go with the No Action Alternative, based on your findings the No action Alternative could have "significant beneficial impacts on land use, cultural practices, and environmental justice." Alternative 1,2,3, have significant adverse impacts on land use (land tenure), cultural practices, and environmental justice could occur Holistic cultural practices that foster a connection to 'āina (land) are important in improving the health of Kānaka Maoli (Indigenous Peoples of Hawai'i), according to a new study from public health researchers at the University of Hawai'i at Mānoa. The findings were published in the International Journal of Environmental Research and Public Health.</p> <p>"Kānaka Maoli view themselves as deeply connected with 'āina, and there is no separating 'āina from Kānaka," said Antonio, an assistant professor of Native Hawaiian and Indigenous health. "The connection between 'āina and people is spiritual and reciprocal, and important to well-being and resilience."</p>	Please see General Response 1.
noelani mengel		What is your current clean up process after training?	Section 3.5.4 includes several details regarding the current processes and SOPs for maintaining ranges after training events. This section covers the treatment and handling of a variety of hazardous substances and hazardous wastes, including MEC. The USAG-PTA External Standard Operating Procedures and the Pohakuloa Training Area Range Operations Standard Operating Procedures are internal documents that are not available for public disclosure. Appendix E includes relevant information from the SOPs. The Freedom of Information Act (FOIA) Library and FOIA Request processes are

**Responses to Second Draft EIS Comments**

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			available at: <a href="https://www.rmda.army.mil/foia/RMDA-FOIA-Division.html">https://www.rmda.army.mil/foia/RMDA-FOIA-Division.html</a> .
noelani mengel		What is your response to the Cultural Monitors at PTA that would help with the trust of the Indigenous People of Hawaii?	Information regarding the management and stewardship of historic and cultural resources, including the Integrated Cultural Resources Management Plan and 2018 Programmatic Agreement are detailed in Section 3.4.4.6 ("Existing Management Measures") of the EIS.
Jeffrey Mermel		<p>Aloha: I am a 47 year kama'aina homeowner and taxpayer here on Hawai'i Island. I am OPPOSED to any new lease NOR any land swap of the 22,750 acres at Pohakuloa Training Area.</p> <p>What is needed is for the Army to CLEAN UP the military mess and RETURN the lands to the Hawai'ian people, similar to what was done on Kaho'lawe.</p> <p>Lastly, I believe that (2) public meetings are insufficient for residents to give input What is needed are PUBLIC HEARINGS in EACH one of the (9) districts of Hawai'i Island.</p> <p>Mahalo Jeffrey Mermel PO Box 342 Volcano, HI 96785 Jeffrey.Volcano@gmail.com</p>	Please see General Response 1.
Tabol Michael		<ul style="list-style-type: none"> <li>• The obliteration of Bikini Atoll in the Marshall Islands by Military nuclear testing.</li> <li>• The destruction of Kaho'olawe's water table by Military nuclear testing.</li> <li>• The contamination and poisoning of Oahu's water from the Navy's multiple fuel leaks.</li> </ul> <p>These are only a few of many examples of how the Military has treated the land that feeds all of us. They seem to have no regard for humanity. For Hawai'i to lease Pohakuloa back to the Army would mean the destruction of those lands and sacred sites. Their track record is indicative of this. The fact that they only paid a dollar for Pohakuloa also shows a big imbalance within Hawai'i's relationship with the US Military. Ua Mau ke Ea o ka 'āina i ka Pono "The sovereignty of the land is perpetuated in righteousness".</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
Leah Miller		As a resident of Hawaii I do not support continued military occupation of Hawaiian land. The use of this land as a military training area has negative impacts to both people and the environment.	Please see General Response 1.
George Miller		Please stop the use of this land for training military. The bombing and shooting of weapons training is so bad for the environment and probably our water sources. This island isn't that big and doing the things the military has done for 65 years is ruining what we could have for clean water and growing food. I strongly oppose the military getting a renewed or new lease to this land and hope they can actually clean up the damage they have done	Please see General Response 1.
Debbie Misajon		Hi. My name is Debbie Misajon, M-I-S-A-J-O-N. And I am calling in opposition to renewing the lease of the military at Pohakuloa Training Area. If you need to reach me directly, you can call me at [REDACTED] or you can send an email to me at [REDACTED]. Thank you.	Please see General Response 1.
Alex Mitchell		I am a prior service member of the US Air Force. I separated out of Joint Base Elmendorf Richardson in 2010 as a Senior Airman. My grandmother is full blooded Hawaiian, born on Molokai, and raised in the foster system on O'ahu. The occupation and desecration of sacred land of the Hawaiian people makes me sick to my stomach. Amongst the other atrocities inflicted by the us military, the occupation of these and other native lands by the United States speaks to the insidious motives and foundation this country has been built upon. Time and time again, this country was built on the enslavement of black and brown people, the illegal occupation of native land and the erasure of their culture, language, tradition, and history. The lands of these people was never yours to claim or own. Give the land back and make a step toward owning the damage you've inflicted on our people.	Please see General Response 1.
Daniel Morimoto		Dear Sirs: Your lease should NOT be renewed. You have not at all been stewards of our Aina. Please withdraw your lease renewal request and start the substantive cleanup required. Also, please share the "virtual reality simulations" that you have said you have used.	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		Thank you, Daniel Morimoto MD kanielamorimoto@yahoo.com	
Karen Murray		Enough is enough. People live here. What century are we in that such dangerous things should be done in populated areas.	Please see General Response 1.
Michael R. Newman		Dear PTA Commander and Esteemed Representatives and Senators, I am writing to express my strong opposition to the renewal of the military land lease on the Big Island, Hawaii. Although I have left with my family to Washington DC, we hope one day to return, and as concerned citizens who wish to invest in the future of Hawaii Island's environmental and social well-being, we find the current proposal to extend the PTA lease both troubling and unacceptable. As we understand, the environmental review process has been inadequate. The documentation provided failed to assess the long-term environmental impacts of continued military presence on the island. Given the Big Island's rich biodiversity and delicate ecosystems, the potential for irreparable harm to native species and habitats necessitates a far more rigorous and comprehensive review than what has been presented. Furthermore, the history of land stewardship and cultural and historic impacts under military control have been subpar. Numerous instances of environmental degradation and insufficient remediation efforts have resulted in lasting damage to the land and surrounding communities. The military's history of neglect and opacity raises grave concerns about future environmental stewardship. Irreparable harm has been done to cultural and historic sites and native wildlife. The people of Hawaii deserve better. A growing movement in our community is now advocating for demilitarization of the island, and the continued military presence is at odds with the values and aspirations of residents who envision a future focused on peace, sustainability, and cultural preservation. Renewing this lease would further entrench the military's footprint on the island, diverting resources and attention away from initiatives that align more closely with these goals. Please end the military land lease on the Big Island and instead	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>prioritize our native environment, ensure responsible land stewardship, and heed the voices of the community calling for a shift toward a more peaceful and sustainable future. Thank you for your attention to this matter. Sincerely, Michael R. Newman</p>	
Faith Ngirmidol-Kelley		<p>It is absolutely detrimental to Hawaii Island to continue military training at Pohakuloa. A slap in the face that these lands have been leased for &amp;1.00 It seems to be in everyone's best interest to find new place to train. In addition please do not forget to clean up UO before you leave....</p> <p>Sincerely, A woman who grew up on the Big Island</p>	Please see General Response 1.
Zara Nicholson		<p>Aloha, My name is Zara Nai'a Nicholson. I am Kanaka Maoli born and raised in Kailua-Kona, Hawaii. I am writing in opposition to the Army's Proposed Action to continue their retention of approximately 22,750 acres of State-leased lands once the lease expires in 2029, either through a new lease or through purchase. I am in full support of the No Action Alternative, under which the State lands will be relinquished back to the State. There are many endemic and indigenous plants and animals living in this area. Some of these species are only found within the Pōhakuloa region and are critically endangered. The landscape of Pōhakuloa is a unique region that once consisted of even more lifeforms than what we see today. As long as the Army retains control of the State-owned lands, native species are under threat of continued mismanagement and negligence. Mahalo for the opportunity to comment. Zara Nai'a Nicholson</p>	Section 3.3.4.3 contains information on native and protected plants along with Army conservation efforts for plant species. Updated information has been added to applicable subsections. Mitigation measures the Army would consider include: (1) a multi-year research project to identify possible biological controls in the native range of C. setaceus (fountain grass); (2) installation invertebrate surveys, and (3) an ungulate impact assessment. These mitigation measures have been added to the Mitigation Measures subsection.
Debra Norenberg		<p>In conclusion, I believe 3 points that indicate errors in the Draft EIS are enough to send it back to the drawing board and end my critique with a simple rejection of the content in it's entirety so as not to waste my time or anyone else's time for that matter, especially volunteers from the community. I do realize and appreciate the importance and purpose of the United States Army's presence which doesn't concern me much however, what does concern me much is what the United States Army is DOING while in</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>my homeland. Together, I'm sure we can always do better to create a peaceful and sustainable present from the lessons learned in the past that our mutually beneficial future will appreciate. Have a great day!</p>	
Debra Norenberg		<p>3) Section ES.13 of the Second Draft EIS also copied below for your convenience discusses consistency with "other Federal, State, and County Land Use Plans, Policies, and Controls." Given the first point I mentioned above, it follows that there may be discrepancies in the interpretations of the law(s) mentioned below given the flawed premises upon which the Army erroneously stands to conclude that their ongoing and planned escalated activities will have no impacts in areas where even to the untrained eye, that it is quite obvious that they will. That said, there is no law in Hawaii greater than the Law of the Land thanks be to God, whose sovereignty rules supreme. I see no consideration of that law in Section ES.13 or anywhere in the second Draft EIS for the P.T.A. Furthermore, I am aware of the little-known fact that Hawaii's laws are rather confounded at the moment, being driven largely by love considering the "strange form of occupation" we have been subjected to that has been recently recognized among members of the United Nations since at least the year 1893. I am also aware of the fact that the United States Military is also aware of this fact concerning their "occupation" here. Finally, the last paragraph of section ES.13 is a repeat paragraph stated elsewhere numerous times in the Draft EIS and claims that the "Proposed Action" is a Real Estate Action when in fact, it is so much more than a "Proposed Action" in Real Estate that allows a mere continuation of previous activities because the Army, in the Draft EIS, also proposes to conduct escalated military operations via the inclusion of their "Stryker Brigade" et al.</p>	Please see General Response 1.
Debra Koonohiokala Norenberg		<p>Aloha,</p> <p>I previously submitted my public comment for the Second Draft EIS with a simple rejection of the Draft in it's entirety due to three fundamental flaws I found within. After much thought, I feel that the problems I found within deserve at</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>least in some small part a viable solution. This solution I propose does not in any way shape or form allow for the escalation or continuation of the U.S. Army's activities, especially those activities that seek the use of weaponry that contain depleted uranium. It merely provides guidance regarding the consideration of the land itself that the U.S. Army wishes to lease. That said, Pohakuloa was once a thriving forest rich in vibrant life. It was harvested to practical oblivion and is now occupied by the U.S. Army with no intention of restoring said forest. The corporation, Weyerhaeuser, headquartered in Oregon is a perfect example of forestry restoration and sustainable harvesting, an example I want to see implemented in Pohakuloa on 8000 acres. So, every year, as part of the U.S. Army Core of Civil Engineer's, et al training, 100 acres are to be planted and the project overseen by "Native" Hawaiians/ "Cultural Practitioners" paid to oversee the project at the Army's expense and as part of the U.S. Army's clean up program. Trees planted need to be those that are native to the area and suitable for the climate/weather there. For forty years, these trees will be planted on a hundred acres resulting in four thousand acres of reforested land with trees present at different ages one year apart. Thereafter, 100 acres will be harvested every year and 100 acres will be planted every year. The proceeds from said harvest will benefit sustainable initiatives island wide. The excess four thousand acres will be reserved lands to be revitalized similarly/used in agriculture to raise livestock as the community sees fit. The program, part of the U.S. Army's clean up program, needs to include members of the U.S. Army in it's operations as a matter of their training and readiness in restorations of environments devastated by warfare.</p> <p>Have a great day!</p> <p>Aloha,</p> <p>Debra Koonohiokala Norenberg, Alii</p>	

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		(Kauwamakaainanakahunaalii, a real person many can rip apart but, not many can put together) *Can doesn't mean should.	
Debra Norenberg		1) In Table ES-3 found in the Draft EIS and copied here for your convenience, the legend indicates that the preferred Alternative 2, (preferred by the Army/Petitioner), has room for improvement because the bull's eye legend erroneously indicates no impact or very little impact to soil, water, and air quality resources and further erroneously indicates that the activities, which are made part and parcel to this "real estate activity" will not contribute hazardous materials into the environment. Also, the Legend used to describe significant impacts, (with room for possible improvement), indicates biological resources would be adversely affected by the Army's ongoing and escalated activities via their proposed "Stryker Brigade" intentions, again made part of this EIS "Real estate Action". Obviously, something in this EIS is amiss when biological life forms are threatened in the area and yet, soil, water, air quality, geography, and hazardous materials are not an issue. So, please tell me, exactly how are these biological organisms threatened and what manner of death do they face?	This EIS is not a part of, or supplemental to, the 2008 Stryker Brigade EIS. The Stryker Brigade EIS provided NEPA analysis for the Battle Area Complex, Ammunition Supply Point, Ammunition Holding Area, Firing Points, and Roads and Training Trail activities that make up a portion of the "ongoing activities" the Army Training Land Retention EIS refers to, but no new or additional training is proposed as a part of this EIS. A description of the criteria for analysis and impact assessments are provided in Chapter 3.
Debra Norenberg		2) Whatever the Army "would consider" in section ES.11 of the Second Draft EIS copied and pasted below for your convenience, should simply be as good as done if it meets the expectations of those the Army is "considering". That said, ES.11 does not consider the land itself and that has not gone unnoticed nor is that acceptable in my opinion, all things considered.	The EIS assumes that existing environmental management plans and policies would remain in effect should if the Army retain the land beyond 2029. Additional mitigation measures are identified in the final EIS. The Record of Decision will adopt these measures, or explain why any are not being adopted.  Land use, and the history of ownership of the land is discussed in Section 3.2.
Debra Koonohiokala Norenberg		Please find attached to this comment a simple rendering to accompany my previous two comments already submitted. I hope this helps provide a visualization for the project proposed moving forward. Also, please note this is one of many possible doable designs for the project. Thank you in advance for your time and attention and have a great day! Aloha! Koonohiokala	Section 2.1 notes that the parameters for the lease compliance actions in the current lease, including forest restoration, are subject to the terms of the current lease and negotiation with the State.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
Debra Koonohiokala Norenberg		In case you didn't get the attachment I sent in my third comment, here it is again, to be sure every effort was made by me to be of some assistance to the General Public and Family. Have a great day! Aloha, Koonohiokala	Section 2.1 notes that the parameters for the lease compliance actions in the current lease, including forest restoration, are subject to the terms of the current lease and negotiation with the State.
Brent Norris		1. The military has bankrupted the United States. 2. The military leaves death everywhere it is invited. 3. The military relies on war to justify taking our money. We need less war.4. Providing a training area for the military is not in alignment with the needs of the land. Therefore, we need less military. 5. Train for war somewhere else please. We are safe. Remove your assets if you think they or you are not safe. Consider moving to an area where people are afraid. 6. Training for war doesn't make you smarter in a place where we value aloha. Thank you for changing your awareness and riding yourself of fear. You don't have to be afraid to make an honest living. Go train for war somewhere else please.	Please see General Response 1.
Momi Nuuhiwa		My name is Momi Nuuhiwa from Hilo. We know that Oahu Circuit Judge, Gary Chang, ordered the state to provide a written -- written stewardship plan, regular monitoring and inspections, inspection reports with recommendations and procedures for addressing violations and debris removal plans. We know that the Hawaii State Supreme Court ruled that the state, the fake state of Hawaii, has not properly managed lands leased to the military on the Big Island, and that part of the military's lease states that DLNR must monitor activities and ensure that trash and unexploded ordinance is removed. The 101-page ruling notes that the large parcel of land was once part of more than 2 million acres owned by the Hawaiian Kingdom. Those lands were transferred illegally to the fake state of Hawaii, and most are managed by DLNR. I believe -- thank you for talking about Public Law 103-150 for reconciliation efforts need to occur beginning with the renewal of all lands going back to the Hawaiian Kingdom. And any lease monies that have been incurred, they need to go to the beneficiaries of these lands, the Kānaka Maoli. The Hawaii State Supreme Court ruling also mandates that the state must make reasonable efforts to preserve and protect the land and develop a land for	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>onsite inspections. The plan must require the military to follow all directives of cleanup and monitoring. We've already heard how unsuccessful the military has been historically in Hawaii in cleanup. You do not have a good record here. The EPA also gave a lot of testimony on the subject of range of contamination for DU, the mention of white phosphorus. We know that Pohakuloa is one of the places for training that uses its training in order to do war against countries like how we're funding the war in -- for Israel; and white phosphorus is being used there against the Palestinian people. All of these weapons that you guys are using and testing here in Hawaii affects not only our people, it's affecting people around the world in a very obscene and degenerate way. I do not support any extension of any leases to the military in Hawaii for the reasons that so many have provided here. You must pack up your things, clean up your mess, and leave Hawaii alone. Mahalo.</p>	
Anela Oh		<p>To whom it may concern, I am writing to voice my concern about the Pohakuloa draft for retention of land on Hawai'i and community outreach/ communication. I find it deeply disrespectful that there would be little time between the public announcement of community meetings with such a massive document. I personally only heard about them this week. I would also like to state that the armies continued disrespect and desecration of our aina is deeply concerning and therefore requires community engagement and allowances for real input. Which given the length of document and time/availability of the given meetings around it is not possible. How are we supposed to come, let alone come educated and with comments under these circumstances? Mahalo, Anela Oh</p>	<p>Section 1.6.4 discusses the public participation for the Second Draft EIS. In accordance with NEPA and HEPA, publication in the Federal Register and in the State Environmental Bulletin initiated a 45-day public review period. Two public meetings were scheduled to provide information to the public and agencies and to facilitate oral and written comments.</p>
J. Omokawa		<p>Dear Mr. Overton, I am trying to learn the 2-sides of Pohakuloa lease renewal. I watched the entire YouTube videos of the May 6 &amp; 7, 2024 public meetings on the Big Island. I noticed a posterboard display that was facing away from the camera. 1. Do you think you could post the posterboard display online in a way that I can read and share the content? The two representatives from the military gave a brief oral presentation, but they didn't</p>	<p>Links to publicly available documents have been added to Chapter 6 of the EIS as well as the PTA EIS website (<a href="https://home.army.mil/hawaii/ptaeis/project-home">https://home.army.mil/hawaii/ptaeis/project-home</a>) under the "Documents" tab.</p> <p>Comments received on the Second Draft EIS will be reproduced in the Final EIS with Army responses.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>respond to the many questions and concerns from the community members that attended the meetings. 2. Could you please post a response to their questions and concerns at a community online site as part of the EIS purpose and process to inform? Then, please share the community online site with me. I want to know, too. My email address is: [REDACTED] It's sort of heart-breaking to hear the angst of so many with unanswered questions. I know that angst. I am from the generation of kids that went to college in the 60s that asked questions about the Vietnam War and didn't get answers. Our kids were dying in that war. Why? There is a really sad letter from a Keio University student during WWII that someone shared with me. The student wrote about getting a college degree with a future to die in a war he didn't understand. This was the angst our 60s university students were living with. Sincerely, J. Omokawa, Oahu</p>	
J. Omokawa		<p>It's sort of heart-breaking to hear the angst of so many with unanswered questions. I know that angst. I am from the generation of kids that went to college in the 60s that asked questions about the Vietnam War and didn't get answers. Our kids were dying in that war. Why? There is a really sad letter from a Keio University student during WWII that someone shared with me. The student wrote about getting a college degree with a future to die in a war he didn't understand. This was the angst our 60s university students were living with.</p>	Please see General Response 1.
J. Omokawa		<p>I am trying to learn the 2-sides of Pohakuloa lease renewal. I watched the entire YouTube videos of the May 6 &amp; 7, 2024 public meetings on the Big Island. I noticed a posterboard display that was facing away from the camera. Do you think you could post the posterboard display online in a way that I can read and share the content?</p>	<p>All materials and documents at the public meetings are accessible on the PTA EIS website at <a href="https://home.army.mil/hawaii/ptaais/project-home">https://home.army.mil/hawaii/ptaais/project-home</a>.</p>
J. Omokawa		<p>The two representatives from the military gave a brief oral presentation, but they didn't respond to the many questions and concerns from the community members that attended the meetings. 2. Could you please post a response to their questions and concerns at a community online site as part of the EIS purpose and process to</p>	<p>Comments received on the Second Draft EIS will be reproduced in the Final EIS with Army responses.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		inform? Then, please share the community online site with me. I want to know, too.	
Danielle Pacific		<p>Alohal am writing to suggest that honoring a request such as "Please Stop" could be the most respectful decision for the Army to make, representing the organization's integrity as well as their ability to listen and respond with honor. "The Army proposes to retain up to approximately 22,750 acres of State-owned land at PTA. The Proposed Action is a real estate action that would enable continuation of ongoing activities on the State-owned land."The ongoing activities--a vague and euphemistic phrase, indeed--includes damage to the habitat, watershed, native species and the people who live upon this land. ALL of the people, including (though not most importantly) your soldiers. It does not include, to my knowledge, restoration of soil, species, habitat, environment and damaged land. When a person asks you to stop harming them, stop hurting them, stop violating their requests....stop, stop, stop...What do you do? When an entire population asks you to stop violating their land, Why have you not stopped?You do not NEED to test any more bombs, weapons or soldiers' skills in this habitat. Please stop.Please return this land to its original condition before you permanently damage THE ISLAND'S watershed with the continuous 'testing'.Mahalo,Danielle PacificUSNavy VeteranResident of Hawai'i Island</p>	<p>Section 2.1 states that ongoing activities include resource management actions, which are activities such as soil erosion control, dust control, biological conservation and restoration, and wildfire management. See the Existing Conditions subsection of each resource area in Chapter 3 for details regarding the Army's current conservation and restoration actions.</p>
Kristen Pahukoa-Sardinha		<p>This is hewa! Have we not learned from Kaho'olawe the impact to our 'Aina when we use our 'Aina for military training? How are we still doing this on such a small place in Hawai'i when America has huge piece's land! We as kanaka can hardly even afford to live here in our home and yet the military destroys the little land we have with weapons and bombs in the name of training! Not to mention the unbelievable lease agreement of \$1.00! America has billions of dollars going into their military and they are paying \$1.00 for our 'Aina to blow it up and leave their 'opala behind? It's sickening and just shows how much America does not care what they did to Hawai'i and her people and what the continue to do. We will never be</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
		American we will always be Hawaiian! What has America done for us? Nothing!	
Merle Pak		No more military use of Hawaiian land! No more leases to US military! They destroy the land and leave their mess behind. So sick of the disregard for human life and safety. Never forget Red Hill!	Please see General Response 1.
Avalon Paradea		Under 3.2 Land Use, is “Lawsuit Against the State” a reference to Ching vs. Case 2019? If so, why not simply name the court case correctly? This is a legal case, which should be explicitly referred to.	The subheading under Section 3.2.4.5 has been revised.
Avalon Paradea		3.4 Historic and Cultural Resources and Cultural Practices It is important to note that the entirety of the Pōhakuloa region is a culturally significant wahi pana. This landscape holds importance as a region long utilized by Kānaka ‘Ōiwi for the acquisition of natural resources, for ceremonial conduct, and for safe passage between various moku and ahupua‘a, among other activities. Were it not for Army occupation, this ‘āina would still be enjoyed as a safe locale to conduct cultural practices.	Please see General Response 1.
Avalon Paradea		3.5 Hazardous Substances and Hazardous Wastes Living downwind from PTA, I am deeply concerned about the quality of our air, soils, and water. Numerous metals and chemicals are listed in 3.5.4.3, such as lead, copper, and antimony. The BAX V-10 was constructed only 13 years ago and already contains dangerous levels of these metals, as stated in the EIS. I worry that these will break down over time and make their way downslope as airborne particulates, or infiltrate our watershed. It is also admitted that future cleanup efforts may include “emerging contaminants” that are as yet unknown, which I find unsettling. I do not agree with the statement that no new impacts on the environment associated with hazardous substances would occur under Alternative 1. Obviously, hazardous substances accumulate over time, and the more activity the Army conducts, the greater the risk of contamination becomes. Under the No Action Alternative, the removal of the Army would result in beneficial impacts. My concerns with the topics highlighted in this section are further allocated to connecting points made in other sections below.	Sections 3.5.4.11 and 3.5.4.12 describe the lack of mobilization of munitions constituents, including depleted uranium, within soil, groundwater, and surface water. The text notes that risk of contaminants mobilizing is not a concern as limited surface water and groundwater pathways on the State-owned land pose minor potential impact to soil and groundwater quality. The best available scientific data for groundwater and surface water quality was incorporated into this EIS. Section 3.9.4.6 documents the existing management measures used by the Army to protect water resources. The State Department of Health (DOH) Safe Drinking Water Branch (SDWB) monitors groundwater quality of aquifers as described in Section 3.9. The DOH SDWB has released groundwater contamination maps for Hawai‘i Island that show most contamination is along the eastern coast of the island. The DOH SDWB Environmental Health Portal is available at <a href="https://eha-cloud.doh.hawaii.gov/sdwb/#!/home">https://eha-cloud.doh.hawaii.gov/sdwb/#!/home</a> . Sections 3.5.4.12 and 3.6.4 contain a discussion on depleted uranium and the Army's 2009 air quality monitoring program, which

Responses to Second Draft EIS Comments

Commenter	Submitted By	Comment	Response
Avalon Paradea		<p>3.7 Noise Those of us in Waikōloa Village regularly hear (and feel) training activity throughout the day. I am aware of many people in Waimea having the same experience. It is disturbing, even miles away. I have also experienced the upsetting noises of military helicopters flying low over Waikōloa Village, including late at night. If we are frightened by these sounds, I can only imagine how distressing these noises must be to the native birds that call Pōhakuloa home. Pueo, nēnē, ‘amakihi, and other species are almost certainly bothered by these noises, which are excruciating at close range. I wonder if such sounds are one reason why ‘ua‘u no longer nest in Pōhakuloa? Claims that birds can become “habituated” to noise pollution are inaccurate. Even a cursory glance at biological literature will show that birds are especially sensitive to noise and that disruptive, ongoing sounds can and do adversely affect their behavior and overall health. The statement that “long-term neighbors outside the installation” acknowledge noises from training but “most are not annoyed by it” seems dubious. Who was asked, and when? There are no references to a survey or a meeting where such a consensus was found. I find it ridiculous that the draft EIS states that under Alternative 1, there is a “less than significant” level of impact regarding noise. I cannot fathom how this determination was made. I agree that the No Action Alternative would result in long-term, beneficial impacts.</p>	<p>concluded that depleted uranium had not impacted air quality at PTA or in the surrounding area.</p> <p>The EIS evaluates noise in terms of the Hawai'i State Department of Health "Hawai'i Maximum Permissible Sound Levels", DoD's Installation Compatible Use Zone and Hawai'i Statewide Operational Noise Management Plans, as well as Army Regulations that categorize noise exposures. Noise modeling is a scientifically proven method of assessing noise impacts. A noise modeling study was done in 2020 that considered noise zones for military munitions using a baseline model (EIS Figure 3-11), a neutral weather model (EIS Figure 3-12), and a model for weather conditions that enhance sound propagation (EIS Figure 3-13). Analysis of the models indicate that less than significant (LUPZ) and generally not compatible (Zone II) noise levels extend slightly beyond the PTA boundary; however, the overlaps occur over uninhabited forest reserve areas and no noise-sensitive lands are impacted. It is understood that noise can be heard beyond the model contours, particularly during inclement weather as discussed in Section 3.7.4; however, any noise that reaches noise-sensitive lands would be less than significant.</p> <p>Section 3.3.4.4 acknowledges that noise can adversely impact wildlife and also provides studies that demonstrate wildlife noise habituation.</p> <p>Please see Section 3.7 for additional information on noise and noise analysis applicable to humans. Noise complaint information can be submitted to Pōhakuloa Public Affairs at <a href="mailto:usarmy.pta.id-pacific.mbx.pta-pao@army.mil">usarmy.pta.id-pacific.mbx.pta-pao@army.mil</a> or 808-787-7839. Please note that concerns are responded to during regular business hours, Monday through Friday, 8:00 a.m. – 4:00 p.m., excluding holidays.</p>
Avalon Paradea		<p>3.8 Geology, Topography, and Soils Vegetation has been significantly reduced in the Pōhakuloa region due to military activity. Continued training is devastating to our soil health. Erosion is a major concern in our island</p>	<p>Impacts from maneuver training activities are monitored and managed through implementation of the ITAM program, which utilizes Best Management Plans to reduce erosion and runoff.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>environment, and as mentioned above, such erosion has contributed to poor air quality in Waikōloa. No EIS is being performed within the Impact Area, which undoubtedly contains the most degraded soils throughout PTA. Considering the ammunitions fired into the Impact Area are deployed from State-owned lands, it seems pertinent to include the Impact Area within the current EIS. If the Army were serious about wanting to mitigate erosion and errant dust, there would be a greater focus on reforestation efforts, rather than temporary applications of lignin sulfonate and the like.</p>	<p>Section 3.6.4 describes fugitive dust conditions at PTA. Total suspended particulate matter and PM10 monitoring has indicated levels of airborne particulate matter well below the USEPA and Hawai'i 24-hour PM10 ambient air quality standard of 150 micrograms per cubic meter. Air sampling has concluded that there is a less than a 0.1 percent chance that the federal and state ambient air quality standard for PM10 would be reached or exceeded.</p> <p>Section 3.5.3 states that the region of influence for hazardous substances and hazardous wastes includes the impact area due to the firing of military munitions from the State-owned land into the impact area. Section 3.5.6 evaluates the potential impacts from continuation of ongoing activities within the State-owned land, which impacts areas such as the impact area.</p>
Avalon Paradea		<p>3.9 Water Resources The Pōhakuloa region is a vital watershed. As stated in the draft EIS, "the uniqueness [of this groundwater] is 'irreplaceable'; and the vulnerability to contamination is classified as 'High.'" Given the potential pollutants listed in section 3.5, I am concerned that these and other pollutants could infiltrate the aquifer. While the groundwater at Pōhakuloa is not directly consumed, all water within our porous, volcanic island is interconnected, eventually reaching water sources that are consumed as well as flowing out to the sea.</p>	<p>The best available scientific data for groundwater and surface water quality was incorporated into this EIS. Groundwater and surface water quality are discussed in Section 3.9 of the EIS. Section 3.9.4.6 of the EIS documents the existing management measures utilized by the Army to protect water resources. The State Department of Health (DOH) Safe Drinking Water Branch (SDWB) monitors groundwater quality of aquifers as described in EIS Section 3.9. SDWB has released groundwater contamination maps for Hawai'i Island that show most contamination is along the eastern coast of the island. The DOH SDWB Environmental Health Portal can be accessed at <a href="https://eha-cloud.doh.hawaii.gov/sdwb/#!/home">https://eha-cloud.doh.hawaii.gov/sdwb/#!/home</a>Section 3.5 Hazardous Substances and Hazardous Wastes presents the existing conditions from current activities at PTA and notes that risk of contaminants mobilizing is not a concern as limited surface water and groundwater pathways on State-owned land pose minor potential impact to soil and groundwater quality.</p>
Avalon Paradea		<p>3.10 Socioeconomics The military is often touted as being a necessary employer within the islands. If we choose to</p>	<p>The potential for the State or other entities to create new employment opportunities under the No Action</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>look at this solely from a numbers perspective, the Army employs only ~1% of the population on Hawai'i Island (1,962 employees out of a population of 199,459). Under the No Action Alternative, the draft EIS states that socioeconomics would be negatively affected were the Army to cease managing the State-owned lands. Ultimately, this claim is contentious. Undoubtedly, many people would face the prospect of losing their jobs; but what the draft EIS ignores is the potential for new employment opportunities through the State or other entities.</p>	<p>Alternative is beyond the scope of this EIS. Although the population within the County of Hawai'i is 199,459, only 88,098 of those individuals were employed. Therefore, the Army employs approximately 2.2% of the working population in the County of Hawai'i. Additionally, employment is not the only metric used to analyze socioeconomic impacts on the local economy.</p> <p>Section 3.10.4 of the EIS discusses socioeconomic impacts to the people of the County of Hawai'i.</p>
Avalon Paradea		<p>3.11 Environmental Justice If the Army is serious about involving people in having agency over the decision-making process, then they need to listen to voices callin for them to vacate this land. The ongoing gaslighting of "caring" for Kānaka and 'āina is exhausting. I could not have put it better than the statement that ongoing Army activity has resulted in "... generations of Hawaiians experiencing military culture and land uses that do not align with traditional cultural values." These are indeed the sentiments of Kānaka 'Ōiwi and other locals in my networks. It does not matter how much discourse the Army engages in with the public, or how much money is put towards natural resource management; at the end of the day, the Army is an instrument of war, and training activities will result in future damages regardless of so-called mitigation efforts. There is no justice to be found when 'āina is treated with such carelessness.</p>	<p>Discussion of the impacts on communities with environmental justice concerns from the Army's historical and current presence and mission activities is provided in Section 3.11.6.</p>
Avalon Paradea		<p>3.16 Human Health and Safety Once again, I shall refer back to section 3.5. The contaminants that plague the landscape at Pōhakuloa are a huge concern for human health, both for employees at PTA and for the general public.</p>	<p>Sections 3.5, Hazardous Substances and Hazardous Wastes, and 3.6, Air Quality, consider public health as it relates to public exposure to military-related hazardous substances/hazardous wastes and airborne contaminants, respectively. Sections 3.5 and 3.6 clarified regarding analysis of human health impacts (military personnel, PTA employees, and public) associated with hazardous substances, hazardous wastes, and airborne contaminants.</p> <p>Section 3.16, Human Health and Safety, discusses safety risks and hazards related to military training activities.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
Avalon Paradea		<p>In Figure 1-2, the State owned lands total 22,971 acres. Removing the 250 acres of DHHL land, that leaves 22,721 acres that the Army proposes to retain. Why is this number constantly rounded up to 22,750? Where are the exact boundaries of the lands the Army wishes to retain? Given how important the Proposed Action is, I would think the Army would be more precise with numbers. Estimates are not legally binding.</p>	<p>Section 2.1 notes that the Proposed Action is to retain up to approximately 22,750 acres; 22,750 is not a precise number. Figure 1-2 shows the boundary of the State-owned land proposed to be retained and does not include the 250 acres of DHHL administered land. The EIS is a disclosure document, and after the completion of the EIS and ROD, the Army may proceed with the selected alternative and would consider, at that time, the appropriate land retention estate(s) and method(s) based on the selected alternative, including the specific acreage to retain.</p>
Avalon Paradea		<p>3.3 Biological Resources Within the ~22,750 acres of State-owned land reside numerous endemic and indigenous plants and animals, including endangered species. In my opinion, staff in the natural resources office (NRO) do a fantastic job working to protect native species as best they can. However, their dedication is quickly rendered meaningless in the face of severe accidents caused by military negligence. In the summer of 2018, a fire was started by Army personnel during a routine helicopter exercise. This fire consumed over 1,000 acres of land, primarily within Training Areas 18 and 22 (TA 18 and TA 22). Both TAs contain fenced units for the purposes of protecting endangered plant species. From what I understand, no endangered plants were known to have been harmed during the fire; however, many native species were destroyed. Over the course of several months shortly after the fire, my team and I were tasked with conducting archaeological surveys within these fenced units. The aftermath was shocking: thousands of dead 'ōhi'a (<i>Metrosideros polymorpha</i>), naio (<i>Myoporum sandwicense</i>), māmane (<i>Sophora chrysophylla</i>), 'a'ali'i (<i>Dodonaea viscosa</i>), and other plants as far as the eye could see. The death of these native species allowed invasive fountain grass to colonize the area expansively.</p>	<p>Section 3.3.4 has been updated with more recent scientific data and surveys and wildland fire analysis in Section 3.3.6 has been revised. Mitigation measures the Army would consider include: (1) a multi-year research project to identify possible biological controls in the native range of <i>C. setaceus</i> (fountain grass); (2) installation invertebrate surveys; (3) an ungulate impact assessment; (4) negotiation of an agreement with the State to monitor wildfires on land not retained; and (5) implementation of additional thermal technology. These mitigation measures have been added to the Mitigation Measures subsection.</p>
Avalon Paradea		<p>Is there a list of the stakeholders identified during the scoping period? How were these people or organizations selected?</p>	<p>Section 8.1 provides information on EIS Scoping Consultation. Section 1.6.1 and Section 1.6.2 describe the public notification process of the NOI and EISPN and the scoping process to obtain public input.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
Avalon Paradea		<p>3.6 Air Quality and Greenhouse Gases In section 3.5, numerous pollutants and their concerns are outlined. I lump many of these concerns with Air Quality due to my experience living in Waikōloa Village, which is located downwind from PTA. Our prevailing trade winds bring copious amounts of dust and debris straight from Pōhakuloa – this is not an overstatement. Years of driving back and forth between PTA and Waikōloa allowed me to observe that much of the dirt that covers our town stems directly from PTA. Our prolonged drought and the fact that this landscape has been largely reduced to barren fields of exposed soil exacerbate this issue. “Dust” is the accumulation of numerous types of particulates, not just soil alone. The monitoring program mentioned in 3.6.4 feels inadequate. This limited study assessed "fugitive dust," which is not well defined herein and likely does not refer to accumulations of dirt and dust downwind, which result from lack of vegetation and subsequent exposure and erosion across the region. How is the standard set? Where did this study take place?</p>	<p>Section 3.6.4 revised to define fugitive dust as small particulate matter that is suspended in the air from soil that has been disturbed by wind or human activities. Text added to indicate that areas with less vegetative cover are more susceptible to fugitive dust production than highly vegetated areas and paved surfaces.</p> <p>Section 3.6.4 states the fugitive dust air monitoring program involved seven monitoring stations on PTA and the 150 micrograms per cubic meter 24-hour PM10 ambient air quality standard was set by the USEPA and state of Hawaii regulatory authority.</p>
Avalon Paradea		<p>The formalized process to allow cultural practitioners access to PTA (ES.11) is absolutely not enough and comes off as a false promise. Access would still be challenging and limited, and there are no guarantees herein that the Army would honor even the most paltry of methods in providing safe access to practitioners.</p>	<p>Section 3.4.4.6 discusses information regarding standardized procedures for cultural access. The Army's mitigation measures for impacts to cultural practices are identified in the Final EIS</p>
Avalon Paradea		<p>One of my greatest concerns are the inconsistencies in reference to cleanup of the State-leased lands. In some sections of the EIS, cleanup (and even reforestation) are written about as a matter-of-fact action; “Implementation of Army lease compliance actions could result in... beneficial impacts... during cleanup and reforestation” (3.11.6.4). In others, cleanup is referred to in uncertain terms; for example, “After the lease expires, and if deemed necessary...” (section 2.2.4, italics added for emphasis). I am wary of the Army not following through with protocol that demands cleanup of the State-leased lands once the lease expires. Thus far, they have proven entirely incapable of cleaning up any part of their mess.</p>	<p>The current status of range management activities regarding hazardous substances and hazardous wastes is discussed in Section 3.5.4. In accordance with the lease and under the provisions of existing law, the Army retains responsibility for cleanup of closed ranges (i.e., State-owned land not retained). After the lease expires, the Army would follow federal law and regulations to determine how and when cleanup and restoration activities for hazardous substances and MEC within the State-owned land not retained would occur under the CERCLA process.</p>

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
Avalon Paradea		It is mentioned that the Army keeps fire records from 1975 on, and yet apparently most of the records prior to 2012 have been lost. What happened to these records? Why were they not backed up somewhere safe? Losing such data is a huge issue, and it suggests that the Army is incapable of protecting and preserving critical information.	The text in Section 3.16.4 has been revised with additional information on historical wildland fires that have occurred on State-owned land and a table has been added summarizing historical fires documented on State-owned land since 2012.
Avalon Paradea		If all of PTA is classified as conservation district under the State's 1961 Land Use Law, any attempt at a future lease agreement or purchase from the State would be unlawful, since military activity on conservation land is not legal. As of the current lease, use by the Army is considered "nonconforming," given the timing of when the lease began and when the land was declared as conservation district, but this allowance would expire the moment the current lease does. For both the State and the Army to be in compliance of the Law, there should be no future lease agreement or purchase of these lands by the Army.	Compliance with HAR Chapter 13-5, Conservation District, has been revised and is discussed in Sections 1.4.2 and 5.3.2. Sections 1.4.2, 3.2, and 5.3.2 have also been revised to make clear that for analysis purposes, the EIS assumes BLNR would establish a special subzone in the conservation district through a rule amendment that allows for military training use.
Avalon Paradea		The loss of cover [from wildland fire] resulted in increased dust storms which negatively impacted those of us living downwind in Waik?loa Village.	Text added to Section 3.6.4 to indicate that wildfires reduce vegetative cover, which can exacerbate fugitive dust production during high wind conditions.
Avalon Paradea		While the Army may claim to provide resources that benefit biological organisms within the Pōhakuloa region, such claims mean nothing when the Army itself poses the greatest immediate threat to lifeforms in this area. The Army makes grand statements of applying lessons learned from recent mistakes, but the harsh reality is that ammunitions in such a dry landscape will invariably result in accidental fires, regardless of mitigation methods. I take issue with the Army's assertion that Alternative 1 will result in any beneficial impacts to our 'āina, and furthermore, the claim that the No Action Alternative could result in significant, adverse impacts. These claims fly in the face of hard evidence to the contrary. Pōhakuloa was once a landscape teeming with life, much of which has been significantly reduced due to Army activity.	Please see General Response 1.
Avalon Paradea		The ethnographic study by McCoy and Orr (2012) mentioned in 3.4.2.1 absolutely baffles me. Why would a study that references no Hawaiian language resources be accepted by the Army? This work was completed seven years after Kepā and Onaona Maly's exceptional	Please see General Response 1.

Responses to Second Draft EIS Comments

Commenter	Submitted By	Comment	Response
		<p>compilation, “Mauna Kea – Ka Piko Kaulana o ka ‘āina” (2005), which documents oral histories, translated nupepa articles, land ownership over time, and other resources that paint a vivid picture of Mauna Kea and the surrounding lands, including Pōhakuloa. In the mo’olelo of Kamiki and Maka’iole, Pōhakuloa features as a guardian of Lake Waiau, demonstrating how deeply intertwined these land features are to one another and to Kānaka. There is no such “lack of information” regarding how important Pōhakuloa is.</p>	
Avalon Paradea		<p>Additionally, I personally observed endemic pueo (<i>Asio flammeus sandwichensis</i>) within TA 18. These ground nesting owls are highly susceptible to the negative effects of fires and other such devastating environmental tragedies. Mere months after the release of the first draft EIS, the Army demonstrated their incompetency once again by causing another fire on July 20th, 2022. This fire, referred to as the Leilani Fire (presumably for its proximity to Pu’u Leilani), spread across 17,712 acres. 12,458 of these acres were outside of PTA and included about half of the remaining forest of the Pu’u Anahulu Game Management Area. The remaining 5,254 acres (which includes 2,880 acres of State-owned land) encompassed threatened and endangered species habitat areas within the training area. As described in the EIS, post-fire assessment determined a net decline of four endangered plant species, as well as destruction to potential habitat of ‘ōpe’ape’a (Hawaiian hoary bat, <i>Aeorestes semotus</i>). It is important to note that this fire surpassed both annual and cumulative allowances for authorized incidental take of roosting habitat. The Leilani Fire exemplifies the Army’s inability to adequately mitigate actions that could prevent such travesties from occurring. It does not matter that troops check conditions hourly; weather at Pōhakuloa can change rapidly. Fires are extremely challenging to predict or control, especially in such a dry, windy landscape.</p>	<p>Section 3.3.4 and Appendix K have been updated with more recent scientific data and surveys and wildland fire analysis in Section 3.3.6 has been revised. Mitigation measures the Army would consider include: (1) a multi-year research project to identify possible biological controls in the native range of <i>C. setaceus</i> (fountain grass); (2) installation invertebrate surveys; (3) an ungulate impact assessment; (4) negotiation of an agreement with the State to monitor wildfires on land not retained; and (5) implementation of additional thermal technology. These mitigation measures have been added to the Mitigation Measures subsection. The Army notified USFWS immediately on July 21, 2022, when the Leilani fire started. In compliance with the 2003 BO, the Army provided the USFWS with information about the Leilani fire impacts (discussed in Section 3.3.4.2) in May 2023, with additional information provided in October 2023 and April 2024. Additional information has been added to Section 3.3.4.1 regarding consultation as a part of the draft Programmatic Biological Assessment, for which consultation with USFWS is anticipated to be completed by end of 2025.</p>
Avalon Paradea		<p>Pōhakuloa is home to several critically endangered species found nowhere else in Hawai’i. It does not matter how much funding the Army provides the NRO when the Army cannot guarantee that they will not undo decades of labor</p>	<p>Section 3.3.4 has been updated with more recent scientific data and surveys and wildland fire analysis in Section 3.3.6 has been revised.</p>

Responses to Second Draft EIS Comments

Commenter	Submitted By	Comment	Response
		<p>put towards protecting these species. Money cannot resurrect the dead. Federal agencies must prevent and minimize the threat of invasive plants, yet wildfires create new habitat for such species, particularly fire-loving fountain grass (<i>Cenchrus setaceus</i>). This easily ignitable grass now dominates most of Pōhakuloa and the arid regions of our leeward side, resulting in a predictable cycle wherein fires lead to more fountain grass leads to more fires. Invasive species management is nearly impossible in such a system. Unfortunately, the Army is not required to publicly share data regarding fires that occur on Army land. I find this highly problematic. I strongly advise sharing this information with the public for the sake of transparency, allowing community members to create an informed opinion regarding the Army’s broad swath of interactions within the Pōhakuloa region.</p>	<p>Mitigation measures the Army would consider include: (1) a multi-year research project to identify possible biological controls in the native range of <i>C. setaceus</i> (fountain grass); (2) installation invertebrate surveys; (3) an ungulate impact assessment; (4) negotiation of an agreement with the State to monitor wildfires on land not retained; and (5) implementation of additional thermal technology. These mitigation measures have been added to the Mitigation Measures subsection.</p> <p>Invasive species management measures are also included in Section 3.3.4.2.</p>
Avalon Paradea		<p>The Game Management Program has not done enough to curb the negative effects of invasive ungulates across the landscape. While fencing does provide significant protection to native plants, there remain thousands of ungulates that roam the land outside these enclosures, causing damage to native species.</p>	<p>Sections 3.2.4.2 and 3.3.4.2 have been updated with additional information on public hunting and PTA game management. In compliance with the 2022 PTA hunting policy and iSportsman management, and pending training compatibility, the Army permits public hunting on PTA on weekends and national holidays.</p> <p>The Army has conservation law enforcement officers and game management support that work to control ungulates at PTA and support the hunting program. The Army would consider an ungulate impact assessment as a mitigation measure.</p>
Avalon Paradea		<p>One of the most horrific things I observed at PTA was a scenario in which Army personnel had shot numerous ‘ōhi’a trees within the IPBC. While this training course is not located on State lands, the fact that it happened at all exhibits how little environmental awareness is imparted on soldiers stationed here. There is no reason for me to believe that such blatant disrespect cannot happen to ‘ōhi’a or other plants within the State-owned lands. In this way opens them to potential infection, including rapid ‘ōhi’a death (ROD).</p>	<p>The Army takes management responsibilities very seriously as outlined in Table 3-12: Best Management Practices and Standard Operating Procedures Supporting Species and Habitat Management.</p>
Avalon Paradea		<p>Under the No Action Alternative, it is noted that both cultural practices and cultural resources would benefit</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>from the absence of Army involvement. Here, I must wholeheartedly agree. The removal of the Army from these lands would be of benefit to Kānaka ʻŌiwi who wish to build pilina with Pōhakuloa. Cultural connections to the land are beneficial to people and to the continued health and prosperity of the land, itself.</p>	
Avalon Paradea		<p>It is important to note here that the State-owned lands include Palila Critical Habitat. Palila (<i>Loxioides bailleui</i>) are a critically endangered Hawaiian honeycreeper. These birds are highly reliant on māmane trees for their sustenance and habitat; the disappearance of māmane in the aforementioned fires is no minor thing.</p>	<p>Section 3.3.4 has been updated with more recent scientific data and surveys and wildland fire analysis in Section 3.3.6 has been revised.</p> <p>Mitigation measures the Army would consider include: (1) a multi-year research project to identify possible biological controls in the native range of <i>C. setaceus</i> (fountain grass); (2) installation invertebrate surveys; (3) an ungulate impact assessment; (4) negotiation of an agreement with the State to monitor wildfires on land not retained; and (5) implementation of additional thermal technology. These mitigation measures have been added to the Mitigation Measures subsection.</p>
Avalon Paradea		<p>The draft EIS further states that the use of military munitions pose a potential threat to soil and groundwater quality. The draft EIS mentions that soldiers are required to collect spent casings, but in my years working on the landscape, I encountered tens of thousands of bullet casings and similar ammunition debris. Sometimes these were scattered, solitary fragments or cartridges; often, these were sizeable piles of rubbish. Dates for bullet cartridges ranged from the 1940s to recent. The Army has done a terrible job of removing this trash which continues to threaten our soil and water resources. The fact that the waters under Pōhakuloa are in excess of 5,000 years of shows how slow recharge rates are in this region. This is all the more reason for surface soils to be cared for now, with the knowledge that our actions today will reverberate across generations into the future.</p>	<p>Please see General Response 1.</p>
Avalon Paradea		<p>Dozens of archaeological sites exist within the State-owned lands. Like the biological organisms mentioned above, these features are at risk from continued Army activities. Under Section 106 of the National Register of Historic Places (NRHP), all federally owned or managed</p>	<p>Section 3.4.4.6 discusses the Army's CRM Program at PTA, including the State-owned land. Previous archaeological surveys are provided in Table 3-14 of the EIS. Section 3.4.4.3 discusses why portions of State-owned land have not been surveyed. Section 3.4.2.1</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>lands require thorough archaeological assessment. Despite this requirement, prior to the 2018 fire, no proper archaeological surveys had been conducted within TA 18 and 22. It was not until after the fire had decimated these areas that my crew was asked to conduct a baseline survey. I should not need to spell out how utterly backwards this was. Ultimately, our efforts resulted in the discovery of several interesting sites. One of these sites contained historic bottles that, sadly, had broken and burned due to the heat of the fire. The fire also ruined any chances at properly identifying fireplaces or hearths, generally identified through the presence of charcoal. Even if historic charcoal were identified, the 2018 fire would render any possibility of radiocarbon dating such sites impossible. In the first draft EIS, it was stated that 11,920 acres of State-owned land have yet to undergo proper archaeological investigation. This data is absent from the second draft for reasons not made clear. However, it is mentioned that there are large tracts of State land that have not been archaeologically surveyed. One of the given reasons for this is that certain portions of the State-leased lands are not used for training. This is a sorry excuse to not survey these lands. As seen with the Leilani Fire and other detrimental events, harm can originate far from impacted areas. The State lands ought to be surveyed in full.</p>	<p>clarifies that this EIS complies with the requirements of NEPA and HEPA. Since the Proposed Action is an administrative action, which is not the type of undertaking that has the potential to cause an effect on historic properties, Section 106 consultation regarding the proposed action is not required. Section 5.3.1 notes that ongoing activities facilitated by the Proposed Action have established mitigation measures through the 2018 Programmatic Agreement executed with SHPD and the Advisory Council on Historic Preservation. Section 5.3.2 discusses that compliance with Chapter 6E would occur after the EIS process. Section 3.4.2 explains that separate Section 106 consultation is also conducted for other activities that fall outside the parameters of the 2018 Section 106 PA for PTA.</p>
Avalon Paradea		<p>Since 2011, my mother has experienced severe neurological issues of unknown origin, manifesting as extreme pain throughout her body. Since 2019, she has suffered a severe, persistent cough that has worsened over time. She takes impeccable care of her body, but she has lived downwind from PTA for nearly 30 years; I cannot help but wonder if breathing contaminants may be a factor in either, or both, of her health problems. I myself have experienced sudden and incapacitating health issues of no known origin, both during my employment at PTA and several months after leaving my position. I realize that health is a complicated topic, but my concern that our community may be suffering ill effects caused by military activity should be taken seriously. I am hardly alone in my</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>fears, as other community members have raised similar concerns during the public scoping process. Mental and emotional wellbeing are sorely lacking in this section. Working at PTA took a dramatic toll on my mental health. Seeing how the land has been desecrated is painful. I know many, many other folks who feel the same, including those who have never set foot on this landscape yet who can feel the pain that emanates from it. Simply driving through the saddle region and briefly glimpsing what has now become a veritable dustbowl is enough to elicit tears from me, every single time.</p>	
Avalon Paradea		<p>Another species of interest is the ‘ua‘u (Pterodroma sandwichensis). These birds once relied greatly on the Pōhakuloa region for habitat and nesting, as well documented by historic accounts and archaeological evidence. The draft EIS states that “no colonies or nesting have been confirmed on PTA,” which I assume refers to active nests. This begs the question: why? Why might ‘ua‘u no longer find this landscape hospitable? It is probable that Army activity is a primary factor in the disappearance of these birds from this region.</p>	<p>In compliance with the 2003 Biological Opinion PTA staff monitor for Hawaiian petrel presence and habitat use. Additionally, PTA natural resources staff assisted the Department of Natural Resources-Division of Forestry and Wildlife staff to survey for Hawaiian Petrel and Band-rump Storm Petrel at Mauna Loa. The best scientific explanation for why this species is no longer found at PTA is introduced mammal predators. Section 3.3.4.2 discusses the actions the Army takes to control small mammal predators. Additional information has been added to Section 3.3.4.2 and to Appendix K.</p> <p>In 2016, it was determined that Hawaiian petrels do not use habitat at PTA; they fly over the installation and PTA continues to record Hawaiian petrel detections at the installation. A study to determine why Hawaiian petrels are not using PTA for nesting is beyond the scope of this EIS. However, the Division of Forestry and Wildlife has noted that in Hawaii, petrel colonies are located above 8,200 feet, which does not include the State-owned land at PTA.</p>
Avalon Paradea		<p>I am personally of the opinion that arguments in favor of Army occupation for the sake of our economy are detrimentally unimaginative. Our community deserves to grow beyond the means of relying on the Army for employment. This will take effort, but it will be well worth it if it means healthier soil, air, and water for ourselves and for future generations. Furthermore, it is important to note that for the Army, employment is merely a numbers</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>game. Two months after I left my position with PTA CRM, the Army chose not to renew their contract with RCUH. With only two weeks’ notice, all of my previous coworkers and supervisors lost their jobs. It took several months for the Army to effectively onboard the new contracting organization (the Colorado Environmental Management of Military Lands, or CEMML), which is illegal to not have had a functioning CRM team for any amount of time. From what I understand, the Army and CEMML eventually offered several of my previous teammates their positions back, but the majority declined. I cannot blame them. It is inhumane to cast people aside with almost no advance notice and expect that they will be grateful to have their jobs reoffered several months later. The decision to begin a new CRM contract with CEMML also means that RCUH – which is a local entity, unlike CEMML – lost money. Hiring outside contractors in no way benefits our local socioeconomics. Through this action, the Army at Pōhakuloa showed their true colors; they have no interest in building positive, lasting, meaningful relationships with the community of Hawai’i.</p>	
Avalon Paradea		<p>Under Alternative 1, it is noted that the Proposed Action would result in adverse impacts on cultural practices due to access limitations, yet impacts to historic and cultural resources are deemed as “less than significant.” This wording is incredibly vague and means basically nothing without substantial clarification. If an iwi kūpuna (ancestral burial) is burned in a fire, but it is the only archaeological site affected in such a scenario, is that considered “less than significant”? Who determines what extent of damage is or is not significant in such a circumstance? What are the criteria? How are Kānaka within the community involved in such determinations, if at all?</p>	<p>Section 3.4.5.1 provides the criteria to assess whether the continuation of ongoing activities would result in potential significant adverse impacts on historic and cultural resources. Section 3.4.4.5 provides the latest information available regarding the evaluations of historic and cultural resources from the Leilani fire.</p>
Avalon Paradea		<p>The draft EIS claims that Alternative 1 will result in “less than significant” impacts; I disagree. Continued training, resulting in the continued addition of ammunitions and associated metals and chemicals to our landscape, and continued physical impacts resulting in erosion, are hardly insignificant</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
Avalon Paradea		Lead is a particular concern, as no amount of lead is safe for biological consumption. As stated in section 3.5, “Lead is the primary COC from small caliber munitions.”	Please see General Response 1.
Avalon Paradea		It is worth pointing out that the State-owned lands do not only reside within Ka’ohe (Hāmākua) and Humu’ula (Hilo), as claimed in the EIS, but also in the ahupua’a and moku of Pu’uanahulu (Kona) and Waikōloa (Kohala).	Section 3.4.4.1 has been updated to explain that the State-owned land resides in Ka’ohe and Humu’ula ahupua’a, and that some historic maps show a small portion of Pu’u Anahulu ahupua’a may comprise a small portion of the State-owned land at PTA. The vast majority of the State-owned land of PTA is within Ka’ohe ahupua’a.
Avalon Paradea		Positionality Statement Aloha kākou. My name is Avalon Paradea and I am from Waikōloa Village, Hawai’i Island. I am writing in opposition to the Army’s Proposed Action to continue their retention of approximately 22,750 acres of State-leased lands once the lease expires in 2029, either through a new lease or through direct purchase. I am in full support of the No Action Alternative, under which the State lands will be relinquished back to the State. I was raised in Waikōloa Village, where I continue to reside with my mother, brother, and partner. From 2017 to 2021, I worked as a cultural resources technician and specialist under the Research Corporation of the University of Hawai’i (RCUH) at PTA. During the three and a half years I worked within this ‘āina, I learned a great deal – both about the rich cultural legacy that Kānaka ‘Ōiwi share with this region, and the mistreatment of this land at the hands of the Army. It was an emotionally taxing job for many reasons, and I chose to leave in the summer of 2021 to pursue my master’s degree in the TCBES program at UH Hilo. Within the second draft EIS, 15 environmental topics are assessed for potential impacts caused by the Proposed Action and each of the four Alternatives. Herein, I provide detailed thoughts on 10 of these subject areas which I feel best qualified to speak on. I include a section on additional concerns and my concluding thoughts following this breakdown.	Please see General Response 1.
Avalon Paradea		Concluding Thoughts In conclusion, I support the No Action Alternative by which the State-leased lands will return to the State in 2029. Throughout the second draft EIS, it is made abundantly	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>clear that the No Action Alternative consistently results in significant, beneficial impacts, as opposed to the numerous adverse impacts that would result from Alternative 1, or from the other Alternative actions. The Army has proven, time and time again, to be a bad neighbor. Public engagement and community outreach has been sorely lacking. I include in this the woefully short timeframe by which community members are expected to read, analyze, and respond to the draft EIS. Among the many, many threats posed by Army training, wildfires sit squarely at the top. I have had to evacuate my home twice due to wildfires. I am terrified at the prospect that Waikōloa will one day be consumed in flames. Should this ever happen, the likelihood that such fires will have been caused by Army negligence are sky high. I care deeply for our ‘āina, for the perpetuity of ‘ike Hawai‘i, and for the wellbeing of our communities, human and otherwise. I strongly believe that the Army is ill suited to retain any degree of control over the State-owned lands once the lease expires in 2029. I look forward to seeing these lands return to the State at the end of this decade, with the hope for better management in the future. E ola Pōhakuloa, may this phenomenal ‘āina experience improved health and continued growth in the years to come.</p> <p>Supplementary Images</p> <p>Below are several photographs exemplifying damages I observed while working at Pōhakuloa</p>	
Avalon Paradea		<p>Additionally, surface water occurs in the form of intermittent flows through several streambeds. As mentioned in the draft EIS, one of these beds is Popo‘o Gulch, which feeds into ‘Auwaiakeakua Gulch. The latter of these runs downslope to Waikōloa Village. During severe rain events, I have personally witnessed substantial water movement through the gulch and connected tributaries, as well as flooding in the lower portions of Waikōloa. Such runoff has the potential to carry military debris and related pollutants straight into our community. The EIS admits that no surface water quality studies have ever been conducted on these ephemeral streams. Once</p>	<p>The best available scientific data for groundwater and surface water quality was incorporated into this EIS. Groundwater and surface water quality are discussed in Section 3.9 of the EIS. Section 3.9.4.6 of the EIS documents the existing management measures utilized by the Army to protect water resources. The State Department of Health (DOH) Safe Drinking Water Branch (SDWB) monitors groundwater quality of aquifers as described in EIS Section 3.9. SDWB has released groundwater contamination maps for Hawai‘i Island that show most contamination is along the eastern coast of the island. The DOH SDWB Environmental Health Portal</p>

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
		again, I disagree with the determination that Alternative 1 will result in “less than significant” effects to our water resources. There is not enough scientific evidence to back up this claim.	can be accessed at <a href="https://eha-cloud.doh.hawaii.gov/sdwb/#!/home">https://eha-cloud.doh.hawaii.gov/sdwb/#!/home</a> Section 3.5 Hazardous Substances and Hazardous Wastes presents the existing conditions from current activities at PTA and notes that risk of contaminants mobilizing is not a concern as limited surface water and groundwater pathways on State-owned land pose minor potential impact to soil and groundwater quality.
Avalon Paradea		Alternative 1 is deemed as resulting in “less than significant” adverse effects for human health and safety. Considering the pollutants that litter the landscape and the threat of wildfires, I must disagree with this determination. There is no clear evidence suggesting that Army activity has no negative impact on human health.	As discussed throughout the EIS and particularly in Sections 3.5 and 3.16, the Army training activities at PTA have safety risks associated with them that include, but are not limited to, presence of and exposure to hazardous substances, aircraft mishap potential, exposure to air pollutants, wildland fires, and noise. As described throughout the EIS, health and safety hazards are managed through adherence to federal and DoD regulations, safety programs, and standard operating procedures. The Proposed Action would not introduce new safety hazards; however, under Alternative 3 and the No Action Alternative, which includes cessation of training activities on the State-owned land not retained, the presence of safety hazards would be reduced compared to existing conditions.
Avalon Paradea		Using local rock for onsite construction in order to minimize the introduction of exotic species onto the land initially comes off as reasonable. However, given the fact that not all of the State-owned lands have been archaeologically surveyed, this activity could very well result in the destruction of unidentified archaeological sites.	Section 3.8.4.4 of the EIS documents the existing management measures utilized by the Army to protect and ensure the minimization of impacts on soil resources from and associated with training. Any rocks used for construction are strictly from the PTA maintained quarry. The Army does not quarry or plan to quarry outside the boundaries of the existing quarry.
Avalon Paradea		The fact that the initial point of ignition occurred within the Impact Area, rendering it impossible to access early on due to the threat of UXO, is especially concerning. The Impact Area is thus likely to pose greater threats over time, both through buildup of UXO and through degradation that exacerbates the probability of wildfires.	Section 3.16.4 contains information from DOD Instruction 6055.06, DoD Fire and Emergency Services Program, and the PTA Integrated Wildland Fire Management Plan regarding PTA's fire department requirements, training, and capabilities. The PTA Integrated Wildland Fire Management Plan is used to respond to and reduce the risk of fires related to training activities.
Avalon Paradea		Additionally, it is stated that of the 25 sites on State land that were within the footprint of the Leilani Fire, only nine	Section 3.4.4.5 has been revised to explain that all 25 previously recorded archaeological sites within the burn footprint on State-owned land have been subject to

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>have been evaluated post-fire. Why are the others not being investigated?</p>	<p>condition assessments which show no clear indication of damage or long-term impacts identified from the fire. The archaeological sites within the burn footprint lack surface archaeological deposits that may be affected by fire (e.g. mixed midden, etc.).</p>
<p>Avalon Paradea</p>		<p>Any efforts at controlling fugitive dust are laughable – there will never not be dust emanating from PTA as long as the landscape is treated like garbage. Wildfire frequency is mentioned as being 37 per year, which is extremely high. As noted in this section, wildfires result in detrimental effects to air quality. I can attest to these effects lasting weeks, even months, in Waikōloa. It is common for ash to continue raining down on our home long after fires have been extinguished. We breathe in these burnt particles, causing short term and possible long term health impacts. The draft EIS openly admits that “long-term beneficial impacts on air quality would result from the No Action Alternative.” I would love to see our skies finally clear and to not feel concerned that I may be breathing in harmful chemicals.</p>	<p>As noted in Sections 3.6.4 and 3.6.6, PTA manages and would continue to manage fugitive dust via 1) erosion control and stabilization techniques (revegetation, erosion control structures, site hardening, dust palliatives) under the Land Rehabilitation and Maintenance component of the Integrated Training Area Management Program, 2) adherence to Unified Facilities Criteria 3-250-09FA, Aggregate Surfaced Roads and Airfields Areas, which has dust control requirements for aggregate surfaced roads and airstrips of airfields at Army installations, and 3) best management practices such as maintenance of roads and training trails, maintenance of vegetative cover, periodic application of water to control dust, and modifying training during high risk conditions. Integrated Training Area Management Program Land Rehabilitation and Maintenance project BMPs are assessed annually during Range and Training Land Assessment reviews. Section 3.6.4 states fugitive dust monitoring was conducted in 2006-2007 then discontinued because a year of monitoring showed the levels to be well below state and federal limits. Section 3.6.4 revised with updated wildland fire data to note that most wildfires that occur at PTA are small with 91 percent being 1 acre or less in size and 83 percent being 0.1 acre or less. The Army follows the PTA Integrated Wildland Fire Management Plan to prevent and respond to wildland fires.</p>
<p>Avalon Paradea</p>		<p>Aloha kākou, I am writing in to share how outraged I am at the poor planning continuously shown by the Army in engaging with the public. The second draft EIS was only just released on April 23rd. While I understand that the meetings that took place yesterday and today were in part aimed at educating the public, the notion that community members would have time to read through this enormous document and be able to provide commentary within two</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>weeks in absurd. Are these the only in-person meetings that will be held? That's it? Two opportunities, back to back, on weekdays? How does it not register to you folks that we need more chances to involve people in this process? The 200,000+ residents who live on Hawai'i Island are spread out: you need to go to the people, not make them come to you. Organize meetings in more than two places, and plan several weekend meetings to allow busy families a chance to actually attend. Additionally, it appears testimony cannot be given over zoom. Will there be any virtual meetings that invite folks to share their sentiments? There really ought to be. Virtual meetings are far more accessible for many, undoubtedly including members of your own team. I see that comments on the second DEIS will only be taken until June 7th. This is absolutely not enough time for people to read through and comment on this document. Three months from release ought to be the minimum amount of time given to provide folks a chance for feedback. Again, this document is lengthy. It is not easy to understand for many people. Finally, there needs to be a concerted effort to raise awareness that this document exists and that our community can comment on it. It always seems that a select few folks (such as myself) know how to find this information, and then it is up to us to disseminate it. The Army should be putting up more fliers, emailing well-established organizations and community boards, putting notices on social media -- really, anything to clarify what this document is and how folks can share their thoughts. It find it disheartening and disrespectful how little the military cares about engaging with our kama'āina. Do better. -- Avalon Paradea (they/them) 2023-2024 Vibrant Hawai'i Art Fellow 'āina-based creative &amp; lū'au lover MS, Tropical Conservation Biology and Environmental Science</p>	
Laura Parker		<p>I was a volunteer on the Friends For Fitness project on Saturday May 25th in KailuaKona, HI. Daily I see one or two people stepping in to assist for a short time. The work that these military citizens had to offer made a big difference. They were willing to do heavy lifting, hauling, cleaning, whatever was needed. They worked together as</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>a team and yet each showed individual leadership responsibility.</p> <p>Thank you supporting our community and our nation.</p>	
Stephen Paulmier		<p>Thank you. My name is Stephen Paulmier. I live in Hilo and I've been here 15 years. It's a short time. There's something called shame, and sometimes we blush, and I just want to say to the officers here who are representing the army, that that would be the appropriate response to what you're hearing. It's a human thing to blush, it's a human thing to have shame when your dignity is lost. Honor is something you must have to defend anything. The honor here is lost. The training that is supposed to happen in the training area, well, there's evidence for whether the training is working or not. Our country's military has been involved in many, many military operations. And we're all blushing from Korea to Vietnam to Afghanistan to Iraq to Libya. They're too many to mention. It is a very, very authentic embarrassment. Something -- there isn't enough blushing and shame to be done with. Do you remember when you were young and you did something you knew was wrong? That's the feeling you should be feeling now. When your mother came to you with tears in her eyes about something you had done, that's the shame that we're all feeling for this mistake. When you don't have honor, when you've been caught in a lie over and over and over again, it's time to stop. The EIS is inappropriate. There shouldn't even be an application. I'm against this. Aloha.</p>	Please see General Response 1.
Alfred Pestrello		<p>The Military has placed an unfair amount of restrictions on our ability to go hunting, to gather and traverse this property that we once had .</p> <p>And Pohakuloa is now a dustbowl . You could call it a wasteland.</p> <p>The US Army has not been the good neighbor or caretaker of these properties.</p>	Section 3.2.4.2 discusses hunting access. Section 3.4.4.6 discusses information regarding standardized procedures for cultural access.
Maxx Phillips	Center for Biological Diversity, Sierra Club Hawai'i Island Group	<p>Despite the abundant scientific literature linking lethal and sublethal impacts of lead and other heavy metal pollution on wildlife and plants, the DEIS fails to adequately describe the Project area's existing conditions and analyze the Proposed Action's impacts to special-status and</p>	The studies in the comment have been reviewed for applicability to the EIS. Sections 3.3 and 3.5 revised with applicable information from the referenced studies and the Phase I and II ECOP reports to describe better the existing conditions and potential impacts of hazardous

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>sensitive species in and near the Project area from consistently releasing harmful chemical contaminants like lead into the environment. Although the DEIS acknowledges that soils from a small portion of the Project area (TAs 7 and 8) contained, “concentrations of COCs (antimony, lead, and zirconium) that potentially pose unacceptable risks to site users (USACE-POH &amp; USAG-HI, 2017b)” with lead concentrations exceeding “the DOH Direct Exposure EAL for unrestricted, commercial/industrial, and construction/trench worker scenarios for direct contact to soil, USEPA Residential and Commercial/Industrial RSLs, and the DOH Tier 1 EAL for gross contamination for unrestricted land use” (DEIS at 3-95), the DEIS fails to provide more specific details and adequate analyses regarding harms of lead and heavy metals pollution to people, wildlife, and plants . A 2017 review found that blood lead levels of shooters at firing ranges far exceeded the U.S. Centers for Disease Control and Prevention/National Institute of Occupational Safety and Health reference level of 5 ug/dL (Laidlaw et al., 2017), and according to Pain et al. (2019), “the toxic effects of lead are broadly similar in all vertebrates and well known from numerous experimental and field studies (reviewed in Eisler 1988; Pattee and Pain 2003; Franson and Pain 2011).” If some of the state lands’ soils exceed standards for human safety, then those levels likely harm native wildlife. The Proposed Action’s impacts from lead and other heavy metals pollution should be thoroughly analyzed and discussed.</p>	<p>substances and hazardous wastes (particularly lead and other contaminants associated with use of military munitions and their potential to accumulate due to continuation of ongoing activities under the Proposed Action).</p> <p>Sections 3.5.4.11 and 3.5.4.12 describe the lack of mobilization of munitions constituents within soil, groundwater, and surface water. The text notes that risk of contaminants mobilizing is not a concern as limited surface water and groundwater pathways on State-owned land pose minor potential impact to soil and groundwater quality.</p> <p>Section 3.5.2 revised to add a definition of operational ranges.</p> <p>Section 2.1 states that after expiration of the current lease, the Army would follow federal law and regulations to determine how and when cleanup and restoration activities for hazardous substances and MEC within the State-owned land not retained would occur under the CERCLA process.</p> <p>Section 3.5.6 revised to clarify that following completion of lease compliance actions and cleanup and restoration activities, the Army would remain responsible for disposing of any MEC that is incidentally found on the State-owned land not retained due to the DoD’s live-fire military training at PTA.</p>
Maxx Phillips	Center for Biological Diversity, Sierra Club Hawai'i Island Group	<p>2.3 Land Retention The Army refers to the land it is using as state-owned land. The Army treats the application to retain lands for the Pōhakuoloa Training Area as a “real estate transaction.” Since the illegal overthrow of the Hawaiian Kingdom, and the establishment of statehood, the land in question remains Hawaiian land held “in trust” for the benefit of native Hawaiians and the general public. While we favor the No Action Alternative, we find that the Army has, to date, failed to comply with previously designated DLNR conditions with regard to waste cleanup,</p>	<p>Sections 3.2.4 and 3.5.4 state that DLNR has implemented the Court Ordered Management Plan and site visits are occurring. The Army has received no corrective action requirements from the site visits. In accordance with the lease and under the provisions of existing law, the Army retains responsibility for cleanup of closed ranges (i.e., State-owned land not retained). After the current lease expires, the Army would follow federal law and regulations to determine how and when cleanup and restoration activities for hazardous</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		removal of hazards, and public health and safety with regard to toxicants dispersed in wind off-site. We ask that the Army initiate and fully fund the clean-up and removal of toxicants, hazards and unexploded ordnance immediately, prior to the expiration of the lease in 2029.	substances and MEC within the State-owned land not retained would occur under the CERCLA process. The entirety of the State-owned land, including where live fire currently is not conducted, remains in use by the Army for training activities and is considered an operational range. After training activities cease and the range is closed, the Army would address MEC through the Military Munitions Response Program, CERCLA, and the terms of the lease.
Maxx Phillips	Center for Biological Diversity, Sierra Club Hawai'i Island Group	To comply with NEPA, each federal agency is required to take a "hard look" at the impacts of its actions prior to the point of commitment, so that the agency does not act on incomplete information, only to regret its decision after it is too late to correct. Yet the DEIS fails to provide sufficient analysis and discussion regarding the Project's impacts to special-status species and wildlife connectivity due to increased chemical contaminants (e.g., lead), noise pollution, and wildfire. The DEIS also fails to adequately analyze and discuss appropriate minimization criteria for such impacts. Therefore, the DEIS fails to comply with NEPA.	<p>Section 3.3.4 has been updated with more recent scientific data and surveys. Wildland fire analysis in Section 3.3.6 has been revised.</p> <p>Mitigation measures the Army would consider include: (1) a multi-year research project to identify possible biological controls in the native range of <i>C. setaceus</i> (fountain grass); (2) installation invertebrate surveys; (3) an ungulate impact assessment; (4) negotiation of an agreement with the State to monitor wildfires on land not retained; and (5) implementation of additional thermal technology. These mitigation measures have been added to the Mitigation Measures subsection.</p> <p>Additional wildlife and noise study information has been added to Sections 3.3.4.4, 3.3.6, 3.7.4, and 3.7.6.</p> <p>Chemical contaminants are discussed in Section 3.5.</p>
Maxx Phillips	Center for Biological Diversity, Sierra Club Hawai'i Island Group	The DEIS fails to accurately describe the Proposed Action and the Project area's baseline environmental conditions. The DEIS erroneously states that "[n]o separate ESA Section 7 consultation is anticipated at this time for the Proposed Action, which is a land retention (real estate) action that does not propose new training or activities" (DEIS at 3-29). This downplays and mischaracterizes the Proposed Action. The Proposed Action is more than just a real estate transaction because it includes a wide variety of repeated military activities that are known to be environmentally destructive, like artillery training, live-fire exercises, maneuvering exercises, pyrotechnics, rockets, aircraft training, and more (Lawrence et al., 2015), that	<p>Section 3.3.4 has been updated with more recent scientific data and surveys. Wildland fire analysis in Section 3.3.6 has been revised.</p> <p>Mitigation measures the Army would consider include: (1) a multi-year research project to identify possible biological controls in the native range of <i>C. setaceus</i> (fountain grass); (2) installation invertebrate surveys; (3) an ungulate impact assessment; (4) negotiation of an agreement with the State to monitor wildfires on land not retained; and (5) implementation of additional thermal technology. These mitigation measures have been added to the Mitigation Measures subsection.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>would otherwise not occur if the lease is not renewed. And these activities would take place within a Conservation District, with protected open space to the northeast and the southwest. Therefore, the DEIS needs to thoroughly analyze baseline conditions and the impacts of extended military activities in the Project area as part of the Proposed Action. The DEIS fails to comply with NEPA and the ESA.</p>	<p>Additional wildlife and noise study information has been added to Sections 3.3.4.4, 3.3.6, 3.7.4, and 3.7.6.</p> <p>Additional information has been added to Section 3.3.4.1 regarding consultation as a part of the draft Programmatic Biological Assessment, for which consultation with USFWS is anticipated to be completed by end of 2025.</p> <p>This is an administrative EIS, all current training has been addressed through separate NEPA analysis. The no action alternative is analyzed for each resource area as described in Chapter 3.</p>
Maxx Phillips	Center for Biological Diversity, Sierra Club Hawai'i Island Group	<p>The DEIS fails to adequately analyze the Proposed Action's noise impacts on special-status species and habitats. In fact, the DEIS dismisses such impacts, stating that "most wildlife in the vicinity are expected to be habituated to noise associated with training activities" (DEIS at 3-137). However, this is pure conjecture and ignores the best available science. The DEIS fails to acknowledge that different species have different reactions to different levels of noise, and understanding how individual species are affected by noise produced by the Proposed Action requires study and analysis. Instead, the DEIS is misleading, claiming wildlife at PTA are habituated to noise without providing substantial evidence to support such claims. The DEIS cites to a literature review (Shannon et al., 2016) as supporting evidence, but the authors actually conclude the opposite of what the DEIS assumes. The researchers state "[t]he majority of studies documented effects from noise, including altered vocal behaviour to mitigate masking, reduced abundance in noisy habitats, changes in vigilance and foraging behaviour, and impacts on individual fitness and the structure of ecological communities" and "[t]he substantial body of scientific research reviewed here provides considerable evidence that anthropogenic noise is detrimental to wildlife and natural ecosystems"</p>	<p>Additional wildlife and noise study information has been added to Sections 3.3.4.4, 3.3.6, 3.7.4, and 3.7.6. It has been documented that different species have different reactions to noise for various reasons, including duration and frequency. No noise studies have been done on PTA specific species; however, surrogate species have been used for analysis.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		(Shannon et al., 2016). The DEIS misinterprets and ignores the science.	
Maxx Phillips	Center for Biological Diversity, Sierra Club Hawai'i Island Group	<p>The DEIS fails to adequately analyze and discuss the Proposed Action's wildfire impacts on special-status and sensitive species in and near the Project area. The DEIS acknowledges that military training activities at PTA sparked numerous fires that burned more than 19,000 acres of habitat within a designated Conservation District on state lands both within and outside of PTA boundaries since 2018. These fires burned 5,254 acres of threatened and endangered species habitat at PTA, about 2,500 acres of 'ōhi'a/native forest habitat that made up approximately 50% of remaining forest in the Pu'u Anahulu Game Management Area and supported at least five federally-listed species, and 7.5 acres of potential 'ōpe'ape'a roosting habitat outside of state-owned land where other federally-listed species occurred. Military training is the primary cause of wildfires in the region, yet the DEIS fails to adequately analyze the Proposed Action's wildfire impacts on special-status and sensitive species. In addition, the DEIS relies on an insufficient Integrated Wildfire Management Plan ("IWFMP") and standard operating procedures to reduce wildfire risk, all of which have clearly been unsuccessful at preventing wildfire ignitions and spread. As climate change intensifies and extreme weather events become more common, continuing to conduct military training activities under business-as-usual methods will increase risks of wildfire ignitions and significantly adversely effect special-status species and unique biodiversity in and near the Project area.</p> <p>Wildfire is an increasing threat to sensitive biological resources and people in Hawai'i. Although it is likely that some fire was used by Polynesians when they first arrived in Hawai'i about 1500 years ago, Hawai'i's landscapes did not evolve with frequent wildfire and many native and endemic species are extremely vulnerable to fire. Alarming, annual area burned on the Islands has increased more than four-fold since the early- and mid-1900s, with fires igniting in and being spread by nonnative</p>	<p>Section 3.3.4 and Appendix K have been updated with more recent scientific data and surveys. Wildland fire analysis in Section 3.3.6 has been revised.</p> <p>Mitigation measures the Army would consider include: (1) a multi-year research project to identify possible biological controls in the native range of <i>C. setaceus</i> (fountain grass); (2) installation invertebrate surveys; (3) an ungulate impact assessment; (4) negotiation of an agreement with the State to monitor wildfires on land not retained; and (5) implementation of additional thermal technology. These mitigation measures have been added to the Mitigation Measures subsection.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>grasses that are a product of European colonial land practices of privatization, agriculture, grazing, and the removal of Native Hawaiian systems of watershed-scale land management (Trauernicht, 2018; Trauernicht et al., 2015). The increased frequency of fires and area burned creates a negative feedback loop of more fire and more nonnative grasses. These nonnative grasses are not only extremely flammable, but they also readily invade native woodlands and outcompete most native vegetation in burned areas (Trauernicht et al., 2015). This leads to large-scale type conversion as native habitats are replaced by nonnative grasses that burn more frequently and more easily, ultimately eliminating native habitats and the species that rely on those habitats while increasing fire threat over time. Increased ignitions from the Proposed Action would lead to a dangerous feedback loop of destructive fires and habitat destruction within the state lands in PTA as well as across thousands of acres outside PTA’s boundaries. The DEIS fails to adequately analyze the Proposed Action’s wildfire impacts to special-status and sensitive species as well as designated and proposed critical habitat in and near the Project area.</p>	
Maxx Phillips	Center for Biological Diversity, Sierra Club Hawai’i Island Group	<p>It is well known that the entirety of the Pōhakuoloa is culturally significant. This landscape holds importance as a region long utilized by Kānaka ‘Ōiwi for the acquisition of natural resources, for ceremonial conduct, traditional and customary practices and for safe passage between various moku and ahupua’a, among other activities. Were it not for Army occupation, this ‘āina would still be enjoyed as a safe locale to conduct these practices today. Dozens of archaeological sites exist within these State-owned lands. Like the biological organisms mentioned above, these features are at risk from continued Army activities.</p>	<p>Section 3.4.4.6, Existing Management Measures, describes the Army’s Cultural Resource Management Program (CRM) at PTA. This includes the existing SOPs and management measures guided by the 2018 Integrated Cultural Resources Management Plan and the 2018 Section 106 PA. Section 3.4.6 details that there would be less than significant adverse impacts to historic and cultural resources under lease and fee simple title due to continued long-term, moderate, beneficial impacts on historic and cultural resources from the continuation of CRM programs and actions that preserve and protect historic and cultural resources. Section 3.2.6 and 3.11.6 recognize that the alienation of land granted to the State under Section 5(f) of the Admission Act (i.e. ceded lands) represents a significant adverse impact.</p>
Maxx Phillips	Center for Biological Diversity,	<p>The DEIS fails to adequately assess and mitigate the Project’s impacts to wildlife connectivity. The Proposed Action would result in continued human presence and</p>	<p>No wildlife corridors have been documented on PTA; however additional figures and discussion of wildland fire impacts have been added to section 3.3.4.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
	Sierra Club Hawai'i Island Group	<p>destructive activities within a Conservation District, including artillery training, live-fire exercises, maneuvering exercises, pyrotechnics, rockets, aircraft training, increased traffic on surrounding roads, and more, that would not occur if the lease were not renewed. The continued use of the state lands would increase a barrier effect between adjacent protected open space to the northeast and southwest of PTA, which could have significant adverse impacts to special-status and sensitive species in and near the Project area.</p> <p>As detailed in a 2021 Center Report (Yap et al., 2021), roads and human infrastructure create barriers that lead to habitat loss and fragmentation, which harms native wildlife, plants, and people. As barriers to wildlife movement, poorly-planned land use can affect an animal's behavior, movement patterns, reproductive success, and physiological state, which can lead to significant impacts on individual wildlife, populations, communities, landscapes, and ecosystem function (Brehme et al., 2013; Ceia-Hasse et al., 2018; Haddad et al., 2015; Marsh &amp; Jaeger, 2015; Mitsch &amp; Wilson, 1996; Trombulak &amp; Frissell, 2000; van der Ree et al., 2011). For example, habitat fragmentation from roads and development has been shown to cause mortalities and harmful genetic isolation in mountain lions in southern California (Ernest et al., 2014; Riley et al., 2014; Vickers et al., 2015), increase local extinction risk in amphibians and reptiles (Brehme et al., 2018; Cushman, 2006), cause high levels of avoidance behavior and mortality in birds and insects (Benítez-López et al., 2010; Kantola et al., 2019; Loss et al., 2014), and alter pollinator behavior and degrade habitats (Aguilar et al., 2008; Goverde et al., 2002; Trombulak &amp; Frissell, 2000).</p>	<p>The text has been updated with more recent scientific data and surveys and wildland fire analysis in Section 3.3.6 has been revised. Mitigation measures the Army would consider include: (1) a multi-year research project to identify possible biological controls in the native range of <i>C. setaceus</i> (fountain grass); (2) installation invertebrate surveys; (3) an ungulate impact assessment; (4) negotiation of an agreement with the State to monitor wildfires on land not retained; and (5) implementation of additional thermal technology. These mitigation measures have been added to the Mitigation Measures subsection.</p>
Maxx Phillips	Center for Biological Diversity, Sierra Club Hawai'i Island Group	<p>The DEIS fails take a "hard look" at the Project's impacts from chemical contaminants pollution The DEIS fails to provide an analysis regarding the impacts of chemical contaminants due to the Proposed Action on sensitive and special-status species and habitats in and near the Project area. In particular, heavy metals like lead are present in munitions and can have significant adverse effects on</p>	<p>The studies in the comment have been reviewed for applicability to the EIS. Sections 3.3 and 3.5 revised with applicable information from the referenced studies and the Phase I and II ECOP reports to describe better the existing conditions and potential impacts of hazardous substances and hazardous wastes (particularly lead and other contaminants associated with use of military</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>plants, wildlife, and people. Studies show that live-fire training shooting ranges like PTA are associated with dangerously high levels of lead and other hazardous metals in the environment (Lawrence et al., 2015; Pain et al., 2019), which leads to contaminated soils, groundwater, and surface water, reduced vegetation growth, and reduced species richness (Cao et al., 2003; Hardison, Jr. et al., 2004; Rodríguez? Seijo et al., 2016; Sehubé et al., 2017). Both acute and consistent exposure to high levels of lead can cause lethal and sub-lethal effects in wildlife, whether animals are directly consuming lead ammunition fragments or getting secondary exposure by ingesting lead-contaminated vegetation or prey animals (Horai et al., 2018; Lawrence et al., 2015; Pain et al., 2019; Rodríguez?Seijo et al., 2016; Work et al., 2015). In Hawai'i, Work et al. (2015) reported lead poisoning deaths in n?n?, and Horai et al. (2018) found that lead concentrations in mongooses from Ukumehame Firing Range were significantly higher than those from other areas. These studies suggest that lead and other heavy metal pollution at PTA has been accumulating over the years and harming native species. Further pollution will continue to occur and harm native species under the Proposed Action. Such contamination will have significant adverse impacts on native vegetation and wildlife in and near the Project area. Yet the DEIS fails to provide an adequate analysis of existing conditions and how repeated live-fire training in the Project area will impact special-status and sensitive species in and near the Project area.</p>	<p>munitions and their potential to accumulate due to continuation of ongoing activities under the Proposed Action).Section 3.5.4.14 describes SOPs the Army adheres to during range training activities to mitigate and prevent contamination of soil and groundwater. Sections 3.5.4.11 and 3.5.4.12 describe the lack of mobilization of munitions constituents within soil, groundwater, and surface water. The text notes that risk of contaminants mobilizing is not a concern as limited surface water and groundwater pathways on the State-owned land pose minor potential impact to soil and groundwater quality. Section 3.5.2 revised to add the definition of operational ranges.Section 3.5.6 revised to indicate the State-owned land retained would remain an operational range for the foreseeable future, deferring site restoration under the Military Munitions Response Program until after range closure. Text has been added to note the State-owned land not retained would no longer be an operational range after the lease expires and the land would be removed from the Army's inventory of operational ranges. At that time, the Army would conduct site restoration in accordance with the Military Munitions Response Program, CERCLA, and the terms of the lease.</p>
Maxx Phillips	Center for Biological Diversity, Sierra Club Hawai'i Island Group	<p>Communities adjacent to and downwind from PTA are concerned about airborne contaminants. Additionally, continued military activity and detrimental effects due to wildfires contribute to the exposure of soils, leading to erosion. During windy days, dirt is kicked up and carried miles from its source point, leading to poor air quality and unhealthy conditions.</p>	<p>As noted in Sections 3.6.4 and 3.6.6, PTA manages and would continue to manage fugitive dust.</p> <p>Sections 3.6.4 and 3.8.4.3 state fugitive dust monitoring was conducted in 2006-2007 then discontinued because a year of monitoring showed the levels to be well below state and federal limits.</p> <p>Section 3.8.4.4 of the EIS documents the existing management measures utilized by the Army to protect and ensure the minimization of impacts on soil resources</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
			from and associated with training, including preventative measures and established procedures for the suppression and control of wildfires and the protection of human life, property, training infrastructures, and natural and cultural resources (USAG-PTA, 2019).
Maxx Phillips	Center for Biological Diversity, Sierra Club Hawai'i Island Group	<p>The Army's claim that it cannot prepare a quantitative, full life-cycle analysis of GHG emissions does not pass the sniff test. The Army has a clear reason for not producing such an analysis. The likely outcome would be a conclusion that the military is a large contributor to global climate change. The Army should not be allowed to escape its legal obligation to produce a quantitative analysis of the greenhouse gas emissions. Self-serving claims of incapacity or incompetence serve to shield the military from regulatory scrutiny by making regulation impossible. The Army must perform an adequately analysis. The law requires it.</p> <p>Regardless, if a quantitative analysis is not completed, then the precautionary principle should be applied. The precautionary principle implies that there is a social responsibility to protect the public from exposure to harm when scientific investigation has found plausible risk. These protections can be relaxed only if further scientific findings emerge that provide sound evidence that no harm will result.</p>	<p>Section 3.6.2 explains why a quantitative, full life-cycle analysis of greenhouse gases has not been performed. Section 3.6.6 provides a qualitative analysis of the direct and indirect greenhouse gas emissions from the Proposed Action alternatives. HEPA does not require a quantitative analysis of greenhouse gas emissions.</p> <p>Text added to Section 5.2 (incomplete information/unresolved issues) to elaborate on the lack of available information to conduct a quantitative analysis of greenhouse gases and associated social costs as well as the reasons for proceeding without resolution.</p>
Maxx Phillips	Center for Biological Diversity, Sierra Club Hawai'i Island Group	<p>If the Army is serious about involving people in having agency over the decision-making process, then they need to listen to voices saying they need to vacate this land. As stated in the EIS "... generations of Hawaiians [are] experiencing military culture and land uses that do not align with traditional cultural values." It does not matter how much discourse the Army engages in with the public, or how much money is put towards natural resource management; at the end of the day, the Army is an instrument of war, and training activities will result in future damages regardless of so-called mitigation efforts. There is no justice to be found when 'āina is treated with such carelessness.</p>	<p>The EIS includes a No Action Alternative under which the State-owned land would return to the State after the lease expires in 2029. Discussion of the impacts associated with the Proposed Action on communities with environmental justice concerns from the Army's historical and current presence and mission activities is provided in Section 3.11.6.</p>
Maxx Phillips	Center for Biological Diversity,	<p>Due to Army activities, UXO remain a threat both within the State-leased lands and elsewhere. Air-borne</p>	<p>As discussed throughout the EIS and particularly in Sections 3.5 and 3.16, the Army training activities at PTA</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
	Sierra Club Hawai'i Island Group	contaminants, poor air quality, and wildfires mentioned previously all have the potential to cause serious health issues within our communities. Noise and vibrations from exploding ordnance affect residential regions including Volcano, Waikoloa, and Waimea, causing emotional and physical trauma. The DEIS provides no evidence suggesting that Army activity is having no negative impact on human health.	<p>have safety risks associated with them that include, but are not limited to, presence of and exposure to hazardous substances, aircraft mishap potential, exposure to air pollutants, wildland fires, and noise. As described throughout the EIS, health and safety hazards are managed through adherence to federal and DoD regulations, safety programs, and standard operating procedures. The Proposed Action would not introduce new safety hazards; however, under Alternative 3 and the No Action Alternative, which includes cessation of training activities on the State-owned land not retained, the presence of safety hazards would be reduced compared to existing conditions. Mitigation measures are provided in Section 3.16.6.</p> <p>Mitigation measures the Army proposes include (1) negotiation of an agreement with the State to monitor wildfires on land not retained and (2) implementation of additional thermal technology. These mitigation measures have been added to the Mitigation Measures subsection.</p>
Maxx Phillips	Center for Biological Diversity, Sierra Club Hawai'i Island Group	<p>Professor Donald Thomas, geologist and the director of the Center for the Study of Active Volcanoes based at University of Hawai'i at Manoa, cooperated with U.S. Geological Survey to conduct a drilling survey titled the Humu?ula Saddle Hydrologic Study Project. They found that the stable water table in the saddle is 4,500 feet above sea level, almost ten times higher than expected. The samples taken at that time could reveal the potential water contaminants close to the surface, but nearly ten years have passed, and he results of those samples has not been released, nor have they been reported in the draft DEIS.</p> <p>The Pōhakuloa region is a vital watershed. As stated in the draft EIS, "the uniqueness [of this groundwater] is 'irreplaceable'; and the vulnerability to contamination is classified as 'High.'" Given the potential pollutants listed in section 3.5, we are concerned that these and other pollutants could infiltrate 14 the aquifer. While the groundwater at Pōhakuloa is not directly consumed, all</p>	<p>The best available scientific data for groundwater and surface water quality was incorporated into this EIS. Water resources and applicable studies are discussed in Section 3.9. Section 3.9.4.6 of the EIS documents the existing management measures utilized by the Army to protect water resources. The State Department of Health (DOH) Safe Drinking Water Branch (SDWB) monitors groundwater quality of aquifers as described in EIS Section 3.9. SDWB has released groundwater contamination maps for Hawai'i Island that show most contamination is along the eastern coast of the island. The DOH SDWB Environmental Health Portal can be accessed at <a href="https://eha-cloud.doh.hawaii.gov/sdwb/#!/home">https://eha-cloud.doh.hawaii.gov/sdwb/#!/home</a></p> <p>Section 3.5 Hazardous Substances and Hazardous Wastes presents the existing conditions from current activities at PTA and notes that risk of contaminants mobilizing is not a concern as limited surface water and groundwater</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>water within our porous, volcanic island is interconnected, eventually reaching water sources that are consumed as well as flowing out to the sea. Lead is a particular concern, as no amount of lead is safe for biological consumption. As stated in section 3.5, "Lead is the primary COC from small caliber munitions." The draft EIS further states that the use of military munitions pose a potential threat to soil and groundwater quality. The draft EIS mentions that soldiers are required to collect spent casings, but bullet casings are known to litter the landscape.</p>	<p>pathways on State-owned land pose minor potential impact to soil and groundwater quality. Section 3.5.4.11 describes the lack of mobilization of munitions constituents, including lead, within soil, groundwater, and surface water. Groundwater extraction from State-owned land at PTA is not proposed as part of the Proposed Action.</p> <p>Section 3.9.4.2 has been updated to include additional information from the Thomas (2019) report. A link to this report has been added to the PTA EIS website (<a href="https://home.army.mil/hawaii/ptaeis/project-home">https://home.army.mil/hawaii/ptaeis/project-home</a>) under the "Documents" tab.</p>
Maxx Phillips	Center for Biological Diversity, Sierra Club Hawai'i Island Group	<p>The DEIS fails to adequately describe and analyze the No Action alternative. The DEIS fails to provide an adequate description and analysis of the No Action alternative. NEPA requires sufficient descriptions and analyses of all alternatives so that decisionmakers and the public can compare them. Yet the DEIS provides an insufficient analysis and discussion of the different alternatives' impacts to biological resources, focusing mostly on how the No Action alternative would impact military training activities. The DEIS's conclusions regarding the No Action alternative's impacts to biological resources are confusing and inaccurate and ignores the best available science. The DEIS erroneously and misleadingly concludes that the No Action alternative "could result in significant, adverse impacts" to biological resources (DEIS at 3-59) while for all other alternatives in which the lease is renewed for some or all portions of the state lands, the DEIS concludes only minor to moderate long-term, adverse impacts to biological resources. But the DEIS fails to provide substantial evidence to support such claims. As described in the above sections, the Proposed Action would result in high levels of chemical contamination and noise pollution while increasing wildfire risk and impacting wildlife connectivity. Such actions will significantly harm special-status and sensitive species when considering the Proposed Action both individually as well as cumulatively, given the history of the site is decades of consistent</p>	<p>Section 3.3.4 has been updated with more recent scientific data and surveys and wildland fire analysis in Section 3.3.6 has been revised. Mitigation measures the Army would consider include: (1) a multi-year research project to identify possible biological controls in the native range of <i>C. setaceus</i> (fountain grass); (2) installation invertebrate surveys; (3) an ungulate impact assessment; (4) negotiation of an agreement with the State to monitor wildfires on land not retained; and (5) implementation of additional thermal technology. These mitigation measures have been added to the Mitigation Measures subsection.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>contamination and degradation from military training activities. Under the No Action alternative, the Army is required to “[m]eet ongoing biological resources mitigation requirements” 15 (DEIS at 2-21), which would suggest that the “continued long-term, moderate, beneficial impacts from uninterrupted Army conservation activities on protected species, native species, and invasive species management” that the DEIS claims would occur from land retention (DEIS at 3-54) would also apply to the No Action alternative. In addition, under the No Action alternative, the Army is required to clean up and restore the state lands, which should include removing high levels of lead and other chemical contaminants deposited by military training activities from the environment, reducing wildfire risk by removing people and ignition sources from the area and collaborating with local stakeholders to restore native vegetation and remove invasive grasses, and removing sources of chronic noise pollution. Applying more conservation mitigation throughout the entirety of the state lands under the No Action alternative would have an even more beneficial impact to biological resources than the Army’s current conservation mitigation requirements. Therefore, contrary to the DEIS’s conclusion, it would be reasonable to conclude that compared to the Proposed Action, the No Action alternative would be much more beneficial for special-status and sensitive species in and near the Project area compared to the Proposed Action or any form of land retention and therefore would have significant beneficial impacts to biological resources. The DEIS inaccurately analyzes and insufficiently discusses the alternatives and ignores the best available science.</p>	
Maxx Phillips	Center for Biological Diversity, Sierra Club Hawai'i Island Group	<p>The DEIS also provides insufficient detail and commitment regarding the Army’s responsibilities to clean up the state-owned lands if the lease were to expire and not be renewed. The DEIS acknowledges the Army would be required to do the following regarding environmental management and cleanup (DEIS at 2-21):</p> <ul style="list-style-type: none"> <li>• Meet ongoing biological resources mitigation requirements (e.g., conservation fence units) in the State-</li> </ul>	<p>Completion of the lease compliance actions is dependent upon technical and economic capabilities (as noted in the lease), Army regulations, and negotiation with the State.</p> <p>The Army will coordinate its cleanup actions with the State of Hawai'i throughout the CERCLA Process.</p> <p>In accordance with the lease and under the provisions of</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>owned land via reforestation of portions of the State-owned land or some other arrangement negotiated with USFWS and State, as applicable.</p> <ul style="list-style-type: none"> <li>• Conduct various lease compliance actions, to the extent feasible, within the State-owned land (following lease expiration and in accordance with the lease or otherwise negotiated with the State).</li> <li>• After the lease expires, and if deemed necessary, the Army would follow Army regulations to determine how and when cleanup and restoration activities for any hazardous substances and hazardous wastes, including MEC, within the State-owned land would occur under the HEPA process. The Army would coordinate these actions with DLNR and the DOH Hazard Evaluation and Emergency Response Office.</li> </ul> <p>However, the DEIS does not provide sufficient detail regarding what the cleanup and restoration activities would entail, and it is unclear why the Army is noncommittal to required cleanup and restoration. Stating that the Army would “[c]onduct various lease compliance actions, to the extent feasible” raises uncertainty regarding whether or not the Army would actually comply with the lease agreement. Furthermore, stating that cleanup and restoration activities for hazardous substances and hazardous wastes “if deemed necessary” suggests that the Army may not in fact restore and clean up the lands that they will have been degrading and contaminating for 65 years. The DEIS should commit the Army to complying with the lease agreement, should it expire, and provide sufficient, recently-collected, ground-truthed data (i.e., not just rely on outdated reports or unsubstantiated assumptions) regarding the existing conditions of the site and a detailed restoration and cleanup plan as part of the No Action alternative. Without a detailed restoration and cleanup plan, decisionmakers and the public cannot compare the No Action alternative to the Proposed Action or other alternatives</p>	<p>existing law, the Army retains responsibility for cleanup of closed ranges (i.e., State-owned land not retained). After the current lease expires, the Army would follow federal law and regulations to determine how and when cleanup and restoration activities for hazardous substances and MEC within the State-owned land not retained would occur under the CERCLA process. The CERCLA process includes phases including preliminary assessment/site inspection, remedial investigation/feasibility study, remedial design/remedial action, and post-construction completion phases.</p>
Maxx Phillips	Center for Biological Diversity,	The DEIS fails to adequately analyze and discuss minimization measures to reduce the Proposed Action’s wildfire impacts. The best way to reduce wildfire ignition	Section 3.3.4 has been updated with more recent scientific data and surveys and wildland fire analysis in Section 3.3.6 has been revised. Mitigation measures the

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
	Sierra Club Hawai'i Island Group	risk and prevent wildfires in the area is to remove ignition sources from the landscape and actively restore native habitat in collaboration with local stakeholders with outplanting native plants, long-term weed management, and ungulate removal throughout area of impact, which would include areas outside PTA boundaries (Cleveland, 2022; Trauernicht et al., 2018; Warner, 2023; Zhu et al., 2021). Although the DEIS alludes to minimal fire preventive measures, the DEIS does not acknowledge that removing military training activities from the Project area would significantly reduce ignition risk.	Army would consider include: (1) a multi-year research project to identify possible biological controls in the native range of <i>C. setaceus</i> (fountain grass); (2) installation invertebrate surveys; (3) an ungulate impact assessment; (4) negotiation of an agreement with the State to monitor wildfires on land not retained; and (5) implementation of additional thermal technology. These mitigation measures have been added to the Mitigation Measures subsection.
Maxx Phillips	Center for Biological Diversity, Sierra Club Hawai'i Island Group	In addition to NEPA, the U.S. Army has the obligation to comply with an analysis of the impacts of lead contamination, noise pollution, and wildfire under the Endangered Species Act. The ESA requires that each federal agency “insure that any action authorized, funded, or carried out by such agency . . . is not likely to jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of habitat of such species.” 16 U.S.C. § 1536(a)(2). To satisfy this ESA mandate, decisions must rely on the best available scientific and commercial data regarding the impacts of lead, noise, and wildfire on the environment and wildlife. 16 U.S.C. § 1536(a)(2). The ESA has specific requirements for formal consultation, such as a description of the action, specific area affected by the action, listed species or critical habitat that may be affected, and an analysis of the cumulative impacts. 50 CFR 402.14(c). The DEIS fails to provide sufficient analyses or discussion of the Proposed Action’s standalone and cumulative impacts to ESA-listed species as well as designated and proposed critical habitat due to lead contamination, noise pollution, and wildfire.	<p>Section 3.3.4 has been updated with more recent scientific data and surveys and wildland fire analysis in Section 3.3.6 has been revised.</p> <p>Mitigation measures the Army would consider include: (1) a multi-year research project to identify possible biological controls in the native range of <i>C. setaceus</i> (fountain grass); (2) installation invertebrate surveys; (3) an ungulate impact assessment; (4) negotiation of an agreement with the State to monitor wildfires on land not retained; and (5) implementation of additional thermal technology. These mitigation measures have been added to the Mitigation Measures subsection.</p> <p>Additional wildlife and noise study information has been added to Sections 3.3.4.4, 3.3.6, 3.7.4, and 3.7.6. Section 3.5 addresses hazardous substances and hazardous wastes.</p> <p>The Army notified USFWS immediately on July 21, 2022, when the Leilani fire started. In compliance with the 2003 BO, the Army provided the USFWS with information about the Leilani fire impacts (discussed in Section 3.3.4.2) in October 2023, with additional information provided and in April 2024. Additional information has been added to Section 3.3.4.1 regarding consultation as a part of the draft Programmatic Biological Assessment, for which consultation with USFWS is anticipated to be completed by end of 2025.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
Maxx Phillips	Center for Biological Diversity, Sierra Club Hawai'i Island Group	<p>Fires not only kill individuals through the direct effects of burning, they destroy habitat and provide conditions favorable to colonization of exotic fire-adapted plant species, most notably Pennisetum setaceum (Forssk.) Chiov. (fountain grass), a highly invasive alien grass originating from North Africa. In the 1990's, two large fires burned in the Kipuka Kalawamauna, an area notable for its high density of endangered species, and P. setaceum now dominates the westernmost portion of this area. On July 20th, 2022, the Army inadvertently started a fire in the Impact Area. This fire, referred to as the Leilani Fire, spread across 17,712 acres. 12,458 of these acres were outside of PTA and included about half of the remaining forest of the Pu'u Anahulu Game Management Area. The remaining 5,254 acres (which includes 2,880 acres of State-owned land) encompassed threatened and endangered species habitat areas within the training area. As described in the EIS, post-fire assessment determined a net decline of four endangered plant species, as well as destruction to potential habitat of 'ōpe'ape'a (Hawaiian hoary bat, Aeorestes semotus). It is important to note that this fire surpassed both annual and cumulative allowances for authorized incidental take of 'ōpe'ape'a roosting habitat. This fire is one of many that the Army has caused over the years, with an average of 37 fires occurring at PTA annually. These fires result in catastrophic damage to our native flora and fauna and threaten the safety of human communities. Low precipitation or other deleterious climate variations could increase the impact of fires by prolonging the time necessary for native vegetation recovery and thereby increase the opportunity for alien species invasion. Alien species tend to be generalists and are better adapted to a wider range of environmental conditions. Therefore, they are more tolerant of drought and other climatic variations that produce negative impacts on the natives. Thus, during periods of stress for the native populations, the exotics have an increased competitive advantage.</p>	<p>Section 3.3.4 has been updated with more recent scientific data and surveys and wildland fire analysis in Section 3.3.6 has been revised. Mitigation measures the Army would consider include: (1) a multi-year research project to identify possible biological controls in the native range of C. setaceus (fountain grass); (2) installation invertebrate surveys; (3) an ungulate impact assessment; (4) negotiation of an agreement with the State to monitor wildfires on land not retained; and (5) implementation of additional thermal technology. These mitigation measures have been added to the Mitigation Measures subsection. As stated in the Integrated Wildland Fire Management Plan, the Army is committed to providing immediate responses to wildland fires. The Army notified USFWS immediately on July 21, 2022, when the Leilani fire started. In compliance with the 2003 BO, the Army provided the USFWS with information about the Leilani fire impacts (discussed in Section 3.3.4.2) in October 2023, with additional information provided and in April 2024. Additional information has been added to Section 3.3.4.1 regarding consultation as a part of the draft Programmatic Biological Assessment, for which consultation with USFWS is anticipated to be completed by end of 2025.</p>
Maxx Phillips	Center for Biological Diversity,	The DEIS fails to consider the impacts of climate change in conjunction with the Proposed Action. As climate change	The EIS recognizes the potential effects of climate change. Section 3.6.6 provides an analysis of climate

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
	Sierra Club Hawai'i Island Group	intensifies, hotter, drier and windier conditions will make the landscape more conducive to wildfire ignitions and spread. This is evidenced by 30- to 40-mph winds that caused the 2022 Leilani Fire to burn more than 17,000 acres (DEIS at 3-34). The Proposed Action would continue to place more people and explosive weapons in an area that is growing exceedingly prone to fire. Continued wildfire ignitions from PTA activities will further degrade and destroy remaining special-status species and native biodiversity in the region. The IWFMP and SOPs are insufficient to adequately minimize the Proposed Action's wildfire impacts on special-status and sensitive species.	<p>change impacts on the Proposed Action as well as the Proposed Action's potential contributions to ongoing climate change.</p> <p>The climate change analysis recognizes the threat of wildfires from climate change. Sections 3.6.6.1, 3.6.6.2, and 3.6.6.3 note that the increased potential for drought may result in increased wildfires, which would adversely impact local air quality. Text added to Sections 3.6.4 and 3.6.6 to indicate that wildfires reduce vegetative cover, which can exacerbate fugitive dust production during high wind conditions.</p> <p>Sections 3.3.4 and 3.3.6 address the risks to biological resources, including special status and sensitive species and native biodiversity, due to wildland fires.</p>
Maxx Phillips	Center for Biological Diversity, Sierra Club Hawai'i Island Group	Much of the state lands are used for live-fire and munitions training (see DEIS Figure 3-7), including designated critical habitat for palila and mā'oli'oli and proposed critical habitat for Hawai'i scaleseed, yet only a very small portion of the state lands outside of designated and proposed critical habitat was tested. Even though the DEIS states that "military munitions use occurs on TAs, FPs, and ranges" and "therefore, these locations have the potential to contain MEC" (DEIS at 3-99), the DEIS states that "[s]oil sampling has not been performed on all the TAs, FPs, and ranges to determine the presence or absence" of munitions constituents ("MCs") (DEIS at 3-99). This suggests that the level of lead contamination across the Project area is unknown and unreported in the DEIS. In addition, no subsurface soils were tested because "historical records and land use did not suggest that subsurface soil impacts have occurred (USACE-POH & USAG-HI, 2017b)" (DEIS at 3-99), though such claims were not substantiated with sufficient evidence. A number of studies have documented elevated lead levels in subsurface soils of shooting ranges (Cao et al., 2003; Olive, 2006; Sanderson et al., 2010), which suggests lead and other heavy metal contaminants could be present in subsurface soils at PTA. The DEIS lacks sufficient	Section 3.5.4.11 revised to state, "Soil sampling to determine the presence or absence of MCs has not been performed at all training areas, firing points, and ranges on the State-owned land due to the impracticality of sampling every such location on an approximately 23,000-acre area." The sentence stating "Subsurface soils were not evaluated because historical records and land use did not suggest that subsurface soil impacts have occurred" is with regard to investigations and active range cleanup actions at the Former Bazooka Range, not the entire State-owned land. Section 3.5.2 revised to add the definition of operational ranges. Section 2.1 states that after expiration of the current lease, the Army would follow federal law and regulations to determine how and when cleanup and restoration activities for hazardous substances and MEC within the State-owned land not retained would occur under the CERCLA process. Section 3.5.6 revised to clarify that following completion of lease compliance actions and cleanup and restoration activities, the Army would remain responsible for disposing of any MEC that is incidentally found on the State-owned land not retained due to the DoD's live-fire military training at PTA. Section 3.5.4.14 describes SOPs the Army adheres to during range training activities to

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>information to accurately describe the Project area’s existing conditions and how the Proposed Action’s lead and heavy metals pollution will impact special-status and sensitive species and critical habitat in and near the Project area. The DEIS also states that current site conditions “produce a low potential for contaminant mobilization via leaching and subsequent migration to a drinking water source that would be consumed by a receptor” and that contaminants “are unlikely to mobilize off-site” (DEIS at 3-96) without providing substantial evidence to support such claims. Such assumptions are pure conjecture and not based on the best available science.</p>	<p>mitigate and prevent contamination of soil and groundwater. Sections 3.5.4.11 and 3.5.4.12 describe the lack of mobilization of munitions constituents within soil, groundwater, and surface water. The text notes that risk of contaminants mobilizing is not a concern as limited surface water and groundwater pathways on the State-owned land pose minor potential impact to soil and groundwater quality. The best available scientific data for groundwater and surface water quality was incorporated into this EIS. Section 3.9.4.6 documents the existing management measures used by the Army to protect water resources. The State Department of Health (DOH) Safe Drinking Water Branch (SDWB) monitors groundwater quality of aquifers as described in Section 3.9. The DOH SDWB has released groundwater contamination maps for Hawai’i Island that show most contamination is along the eastern coast of the island. The DOH SDWB Environmental Health Portal is available at <a href="https://eha-cloud.doh.hawaii.gov/sdwb/#!/home">https://eha-cloud.doh.hawaii.gov/sdwb/#!/home</a>. Section 3.3 revised with information from the Phase II ECOP relevant to potential impacts of hazardous substances and hazardous wastes on biological resources. The referenced studies were reviewed and relevant information added to Section 3.5.4.11.</p>
Maxx Phillips	Center for Biological Diversity, Sierra Club Hawai’i Island Group	<p>The DEIS also fails to adequately discuss appropriate mitigation for such impacts. Toxic contaminants including depleted uranium will break down over time and make their way downslope as airborne particulates, or they infiltrate our watershed. It is also admitted that future cleanup efforts may include “emerging contaminants” that are as yet unknown. We incorporate by reference the comments provided by Michael Reimer, PhD with regard to the inconsistencies and incomplete information about depleted uranium used in munitions and the downwind aerosolized particles and potential effect on human health.</p>	<p>As stated in Section 3.5.6, the analysis contained within the EIS has concluded that no mitigation measures are recommended beyond the existing management measures described in Section 3.5.4.14.</p> <p>Sections 3.5.4.11 and 3.5.4.12 describe the lack of mobilization of munitions constituents, including depleted uranium, within soil, groundwater, and surface water. The text notes that risk of contaminants mobilizing is not a concern as limited surface water and groundwater pathways on the State-owned land pose minor potential impact to soil and groundwater quality.</p> <p>The best available scientific data for groundwater and surface water quality was incorporated into this EIS.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
			<p>Section 3.9.4.6 documents the existing management measures used by the Army to protect water resources. The State Department of Health (DOH) Safe Drinking Water Branch (SDWB) monitors groundwater quality of aquifers as described in Section 3.9. The DOH SDWB has released groundwater contamination maps for Hawai'i Island that show most contamination is along the eastern coast of the island. The DOH SDWB Environmental Health Portal is available at <a href="https://eha-cloud.doh.hawaii.gov/sdwb/#!/home">https://eha-cloud.doh.hawaii.gov/sdwb/#!/home</a>.</p> <p>Sections 3.5.4.12 and 3.6.4 contain a discussion on depleted uranium and the Army's 2009 air quality monitoring program, which concluded that depleted uranium had not impacted air quality at PTA or in the surrounding area.</p>
Maxx Phillips	Center for Biological Diversity, Sierra Club Hawai'i Island Group	<p>Soils accumulate lead and other contaminants, which, even in arid areas, can spread during rain events or extreme weather events, including when fires (often caused by the PTA [see DEIS at 3-33 to 3-36, 3-51]) occur. For example, when the 2018 Camp Fire burned 19,000 structures in Paradise, CA, the California Air Resources Board ("CARB") found that high levels of heavy metals like lead and zinc traveled more than 150 miles via smoke (CARB, 2021). Therefore, it is reasonable to consider that smoke blown from wildfires that burn through the PTA's highly contaminated soils and vegetation could contaminate soils, surface water, and sensitive habitats (and present public health concerns) well beyond PTA's borders. In addition, fire scars can increase erosion if rains occur, which causes large amounts of soil and its contaminants to runoff into watershed and ocean ecosystems. Multiple studies have shown that lead from shooting ranges contaminate offsite areas (Chrastný et al., 2010; Fayiga &amp; Saha, 2016). The DEIS fails to adequately analyze the impacts of the Proposed Action's lead and heavy metal pollution in and near the Project area. The DEIS fails to acknowledge that current Army activities and the Proposed Action have resulted in and will continue to cause dangerous levels of lead and other heavy metal</p>	<p>Section 3.5.4.11 revised to note that contaminants can travel via smoke from wildfires and impact other areas via deposition, and that wildfires can exacerbate the spread of contaminants by reducing vegetative cover to make soils more susceptible to erosion. Sections 3.5.4.11 and 3.5.4.12 describe the lack of mobilization of munitions constituents, including lead and depleted uranium, within air, soil, groundwater, and surface water. The text notes that risk of contaminants mobilizing is not a concern as limited surface water and groundwater pathways on the State-owned land pose minor potential impact to soil and groundwater quality. Section 3.5.6 revised to describe better the potential for lead and other contaminants associated with the use of military munitions to accumulate due to continuation of ongoing activities under the Proposed Action. Section 3.3 revised with information from the Phase II ECOP relevant to potential impacts of hazardous substances and hazardous wastes on biological resources. The Chrastný et al., 2010 study was for a firing range that used lead pellets and contamination of agricultural soils, which is not applicable to military munitions fired within the State-owned land. The Fayiga and Saha, 2016 study was</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		poisoning that will significantly adversely impact special-status and sensitive species, designated and proposed critical habitat, and people in and near the Project area. In turn, the DEIS fails to adequately assess the Proposed Action’s impacts to biological resources from chemical contamination due to military training activities.	reviewed and applicable information added to Section 3.5.4.11.
Maxx Phillips	Center for Biological Diversity, Sierra Club Hawai'i Island Group	In fact, Shannon et al. (2016) highlight two studies in which noise levels of more than 80 dBA from military aircrafts elicited alert responses and behavioral shifts in several duck species (Conomy et al., 1998; Goudie & Jones, 2004). Goudie & Jones (2004) found that increasing noise levels resulted in more intense behavioral shifts, including more aggressive behavior up to 120 minutes after over-flights and decreased courtship behavior up to 90 minutes after over-flights. The authors note: “Such residual effects are cause for concern, because they are potentially more detrimental than immediate responses and may not be detected in studies that focus on readily observed overt behaviours. The alert and aggressive responses we documented are indicative of ‘fight or flight’ responses, and imply that harlequin ducks perceived loud military jet noise as a stressor. Chronic exposure to military jet noise could have negative consequences for individuals.” (Goudie & Jones, 2004). The researchers postulate that some species that live in areas with chronic noise pollution may become more sensitive to noise stressors like military aircraft over-flights instead of becoming habituated or less sensitive to them (Goudie & Jones, 2004). Therefore, special-status and sensitive species like ‘io, nēnē, pueo, ‘ua‘u, ‘akē‘akē, and other native wildlife could be significantly adversely affected by the Proposed Action. NEPA requires the DEIS to analyze and discuss these potential impacts.	Additional wildlife and noise study information has been added to Sections 3.3.4.4, 3.3.6, 3.7.4, and 3.7.6. It has been documented that different species have different reactions to noise for various reasons, including duration and frequency. No noise studies have been done on PTA specific species; however, surrogate species have been used for analysis.
Maxx Phillips	Center for Biological Diversity, Sierra Club Hawai'i Island Group	In addition to the review cited by the DEIS, many other studies have shown that high levels of anthropogenic noise harm wildlife and plants across diverse taxa. For example, field observations and controlled laboratory experiments have shown that traffic noise can significantly degrade habitat value for migrating songbirds (Ware et al., 2015). Subjects exposed to 55 and 61 dBA (simulated	Additional wildlife and noise study information has been added to Sections 3.3.4.4, 3.3.6, 3.7.4, and 3.7.6.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		traffic noise) exhibited decreased feeding behavior and duration, as well as increased vigilance behavior (Ware et al. 2015). Such behavioral shifts increase the risk of starvation, thus decreasing survival rates.	
Maxx Phillips	Center for Biological Diversity, Sierra Club Hawai'i Island Group	Another study found a 28% decrease in bird abundance in areas when traffic noise was present compared to when there was no traffic noise (McClure et al., 2013). In addition to noise produced by military training activities, the Proposed Action would also result increased traffic (compared to the No Action alternative) on roads due to frequent convoys and vehicles supplying water, fuel, food, equipment, and other supplies to the PTA, which suggests the Proposed Action could have significant adverse impacts on special-status and sensitive species in and near the Project area. The DEIS fails to adequately analyze the Proposed Action's impacts on biological resources.	Additional wildlife and noise study information has been added to Sections 3.3.4.4, 3.3.6, 3.7.4, and 3.7.6.
Maxx Phillips	Center for Biological Diversity, Sierra Club Hawai'i Island Group	Another study found noise pollution above 58 dBA resulted in reduced foraging efficiency in pallid bats, likely because noise disrupted their hearing while they were hunting (Bunkley & Barber, 2015). And Luo et al. (2015) found that Daubenton's bats, who also rely on their hearing to forage, would abandon foraging efforts in noisy areas, which also decreased foraging efficiency. Reduced foraging efficiency could lead to reduced fitness and survival, which could have impacts at the individual, population, and ecosystem level. This suggests that noise from military activities could have significant adverse impacts on other bat species that rely on auditory cues and echolocation for foraging, like the 'ōpe'ape'a. Yet the DEIS fails to adequately analyze and mitigate the Proposed Action's noise impacts on 'ōpe'ape'a and other special-status wildlife in or near the Project area. Chronic or long-term noise pollution can impair foraging and anti-predator behavior, reproductive success, density and community structure across diverse taxa (Barber et al., 2010; Francis & Barber, 2013; Habib et al., 2007).	Additional wildlife and noise study information has been added to Sections 3.3.4.4, 3.3.6, 3.7.4, and 3.7.6.
Maxx Phillips	Center for Biological Diversity, Sierra Club Hawai'i Island Group	Even plants can be impacted by chronic noise pollution. In a study conducted in New Mexico, continuous noise from natural gas wells was found to reduce tree seedling recruitment and evenness, likely due to noise altering the	Additional wildlife and noise study information has been added to Sections 3.3.4.4, 3.3.6, 3.7.4, and 3.7.6.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>movement and behavior of seed-dispersing and pollinating wildlife (Phillips et al., 2021). This indicates that the numerous special-status and sensitive plants in and near the Project area, like mā'oli'oli, heau, Hawaiian fescue, 'ihi, and others could be significantly adversely impacted by the Proposed Action. Yet the DEIS fails to adequately analyze and discuss the Proposed Action's noise impacts on special-status plant species in and near the Project area.</p>	
Maxx Phillips	Center for Biological Diversity, Sierra Club Hawai'i Island Group	<p>In Figures 3-9 and 3-10 the DEIS shows that most of the state-owned lands currently experience peak noise levels of 115 dBA or greater (DEIS at 3-140 and 3-141), well above noise levels that have been found to harm species. And the noise pollution extends beyond the current lease boundaries, including on roads used for convoys and supply deliveries. The Proposed Action would result in the continuation of these high levels of noise in and near the Project area. Despite ample scientific evidence that indicates noise pollution can have significant adverse effects on wildlife and plants, no analyses were conducted to determine the Proposed Action's noise impacts on special-status species and critical habitat in and near the Project area. The DEIS fails to comply with NEPA.</p>	<p>Additional wildlife and noise study information has been added to Sections 3.3.4.4, 3.3.6, 3.7.4, and 3.7.6.</p>
Maxx Phillips	Center for Biological Diversity, Sierra Club Hawai'i Island Group	<p>Habitat loss and fragmentation also severely impacts plant communities. An 18-year study found that reconnected landscapes had nearly 14% more plant species compared to fragmented habitats, and that number is likely to continue to rise as time passes (Damschen et al., 2019). The authors conclude that efforts to preserve and enhance connectivity will pay off over the long-term (Damschen et al., 2019). In addition, connectivity is important to allow for range shifts and species migrations as climate changes (Cushman et al., 2013; Heller &amp; Zavaleta, 2009; Krosby et al., 2018). Loss of wildlife connectivity decreases biodiversity and degrades ecosystems. Edge effects like noise pollution, chemical contamination, and wildfire caused by military training activities and operations will have impacts on adjacent wildlife and wildlife movement. In addition, increased traffic (compared to the No Action alternative) on roads</p>	<p>Section 3.3.4 has been updated with more recent scientific data and surveys and wildland fire analysis in Section 3.3.6 has been revised. Additional information on actions the Army incorporates to manage and minimize the spread of invasive species and additional noise and wildlife information has been added to the section 3.3.4 as well. Section 3.5 addresses hazardous substances and hazardous wastes. No habitat fragmentation is expected, and no wildlife corridors have been documented on PTA. Mitigation measures the Army would consider include: (1) a multi-year research project to identify possible biological controls in the native range of <i>C. setaceus</i> (fountain grass); (2) installation invertebrate surveys; (3) an ungulate impact assessment; (4) negotiation of an agreement with the State to monitor wildfires on land not retained; and (5) implementation of additional</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>due to frequent convoys and vehicles supplying water, fuel, food, equipment, and other supplies to PTA could lead to direct mortalities via wildlife-vehicle collisions, increased noise pollution, spreading invasive species, genetic isolation of species populations, and igniting wildfires. Yet the DEIS fails to adequately analyze and discuss these issues.</p>	<p>thermal technology. These mitigation measures have been added to the Mitigation Measures subsection.</p>
Maxx Phillips	Center for Biological Diversity, Sierra Club Hawai'i Island Group	<p>The DEIS fails to comply with NEPA and the ESA. It is widely recognized that the continuing fragmentation of habitat by humans threatens biodiversity and diminishes our (humans, plants, and animals) ability to adapt to climate change. In a report for the International Union for Conservation of Nature (“IUCN”), world-renown scientists from around the world stated that “[s]cience overwhelmingly shows that interconnected protected areas and other areas for biological diversity conservation are much more effective than disconnected areas in human-dominated systems, especially in the face of climate change” and “[i]t is imperative that the world moves toward a coherent global approach for ecological connectivity conservation, and begins to measure and monitor the effectiveness of efforts to protect connectivity and thereby achieve functional ecological networks” (Hilty et al., 2020). The DEIS must take this into account when analyzing the Proposed Action’s impacts to special-status species, critical habitat, and native biodiversity.</p>	<p>The proposed action of this EIS is a real estate action that will enable current uses to continue. All training activities have been analyzed under previous NEPA as noted in Table ES-1.</p> <p>Impacts to native and protected species, as well as critical habitat is analyzed in Section 3.3.6 and no habitat fragmentation is expected and no wildlife corridors have been documented on PTA. Section 3.3 has been updated to reflect this information.</p>
Maxx Phillips	Center for Biological Diversity, Sierra Club Hawai'i Island Group	<p>Instead of providing the necessary information to comply with the ESA and NEPA, the DEIS relies on outdated reports (Biological Opinions from 2003, 2008, and 2013) while simultaneously relying on an unknown and undeveloped future “programmatic approach to ESA consultations for PTA with USFWS” (DEIS at 3-29). This illegally (and conveniently) absolves the Army of any responsibility to assess the Project area’s baseline conditions and the Proposed Action’s significant adverse impacts on ESA-listed species like ‘ōpe‘ape‘a and anthricinan yellow-faced bee (<i>Hylaeus anthracinus</i>), designated critical habitat for palila and mā‘oli‘oli, proposed designated critical habitat for Hawai'i scaleseed</p>	<p>The Proposed Action is a real estate action (i.e., administrative action) that would enable the continuation of ongoing activities on the State-owned land. The Proposed Action does not include construction, modernization, or changes in training activities, which are covered under separate NEPA analyses. Mitigation measures and BMPs resulting from prior NEPA are ongoing, to include environmental monitoring and conservation activities. Any such changes to future ongoing activities would be subject to separate, future NEPA analysis.</p> <p>The baseline for analysis considers all prior and current</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		(Spermolepis hawaiiensis), and other rare and sensitive native animals and plants in and near the Proposed Action area. ESA consultation is required if a Proposed Action may affect listed species and critical habitat, and extending military activities beyond the current lease agreement will do just that. The DEIS fails to provide an up-to-date analysis of the Project area’s existing baseline conditions and how additional years of environmentally destructive military activities will affect ESA-listed species in and near the Project area.	training, environmental monitoring and conservation activities.
Maxx Phillips	Center for Biological Diversity, Sierra Club Hawai'i Island Group	A DEIS must fulfill and satisfy to the fullest extent possible all of the requirements established for a final EIS. 40 C.F.R. § 1502.9(a). This includes a description of the area that would be affected by the alternatives under consideration. 40 C.F.R. § 1502.15. Where there is incomplete information that is relevant to the reasonably foreseeable impacts of a project and essential for a reasoned choice among alternatives, the Army must obtain that information unless the costs of doing so would be exorbitant or the means of obtaining the information are unknown. 40 C.F.R. § 1502.22. Here, the DEIS relies on outdated reports and insufficient analyses to conclude that the Proposed Action would result in only “negligible” to “moderate” adverse impacts to special-status species without providing substantial evidence to support such findings.	Section 3.3.4 has been updated with more recent scientific data and surveys and wildland fire analysis in Section 3.3.6 has been revised. Mitigation measures the Army would consider include: (1) a multi-year research project to identify possible biological controls in the native range of C. setaceus (fountain grass); (2) installation invertebrate surveys; (3) an ungulate impact assessment; (4) negotiation of an agreement with the State to monitor wildfires on land not retained; and (5) implementation of additional thermal technology. These mitigation measures have been added to the Mitigation Measures subsection.
Maxx Phillips	Center for Biological Diversity, Sierra Club Hawai'i Island Group	The DEIS must be revised and re-circulated to include an up-to-date biological assessment that includes more recent data and analyses from the Project area to correct this and comply with NEPA and the ESA.	Section 3.3.4 has been updated with more recent scientific data and surveys and wildland fire analysis in Section 3.3.6 has been revised and additional mitigation measures proposed.  Additional information has been added to Section 3.3.4.1 regarding consultation as a part of the draft Programmatic Biological Assessment, for which consultation with USFWS is anticipated to be completed by end of 2025.
Maxx Phillips	Center for Biological Diversity, Sierra Club Hawai'i Island Group	The cultural impact assessment included in this draft has been reduced to a fraction of the material contain in the last draft, and the comments made regarding the last draft were not adequately addressed.	The first draft CIA was revised to improve readability, focus analysis within the project area and broad geographical area, and add information from new survey respondents and interviews. No information provided by

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>We incorporate by reference the 37 pages of comments made by E. Kalani Flores to the previously released April 2022 draft EIS. E. Kalani Flores served on the Pōhakuloa Training Area – Cultural Advisory Committee (CAC) since its inception in 2002 through several base commanders until July 2013.</p>	<p>the interviewee and survey respondents was removed from the DEIS CIA.</p>
<p>Maxx Phillips</p>	<p>Center for Biological Diversity, Sierra Club Hawai'i Island Group</p>	<p>Aloha, Please accept these comments concerning the Second Draft Environmental Impact Statement for Army Training Land Retention at Pōhakuloa Training Area in Hawai'i, dated 2024. These comments are submitted on behalf of the Center for Biological Diversity, Sierra Club Hawai'i Island Group, and the Conservation Council for Hawai'i ("the Conservation Groups"). The Center for Biological Diversity ("the Center") is a nonprofit conservation organization whose mission is to protect and restore endangered species and wild places through science, policy, education, advocacy, and environmental law. The Center has over 89,000 members, many of which reside and/or recreate in the Hawaiian Islands. The Center and its members believe that the welfare of human beings is deeply linked to nature — to the existence in our world of a vast diversity of wild animals and plants. Because diversity has intrinsic value, and because its loss impoverishes society, we work to secure a future for all species, great and small, hovering on the brink of extinction. For over 50 years, the mission of the Sierra Club of Hawai'i ("SCH") has been to explore, enjoy, and protect the wild places of the earth; to practice and promote the responsible use of the earth's ecosystems and resources; to educate and enlist humanity to protect and restore the quality of the natural and human environment; and to use all lawful means to carry out these objectives. The Conservation Council for Hawai'i ("CCH") has, since the 1950's, strived to protect Hawai'i's native species, advance biosecurity, and preserve the ecosystems that are foundational to our lāhui. The Center for Biological Diversity, Sierra Club Hawai'i Island Group and Conservation Council for Hawai'i opposes the Army's Proposed Action to continue their retention of approximately 22,750 acres of State-leased lands, once</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		the lease expires in 2029, either through a new lease or through purchase. The Conservation Groups are in full support of the 'No Action Alternative,' under which the State lands will be relinquished back to the State.	
Rebecca M Pierotti		Aloha, I am in opposition to the continuation of the army continuing its lease of Pōhakuloa and in no respect shall it be expanded. As a resident of the Big Island, Volcano, District of Ka'u, I frequently travel the Saddle Road for work, and also am at higher elevations for several days on Mauna Loa. The environmental destruction, noise pollution, and general emotional impact of army presence greatly impacts residents, the native landscape and fauna. Even at high elevation on Mauna Loa the bombing can be heard, and their heavy machines and war games create extreme high dust and fire hazards in a sensitive area. The army's heavy machinery also degrades our roads as they move their convoys up and down the sides of major routes. Hawaii deserves peace. Rebecca M. Pierotti	Sections 3.5, 3.6, 3.7, and 3.12 of the EIS provide information on hazardous substances and hazardous wastes, air quality, noise, and transportation and traffic
Shakeisha Angay Pih		Aloha, I kindly ask that the army does not retain the least on the land. The land needs time to heal and regenerate. Please take this into consideration.  Mahalo,  Shakeisha Olalokahi Angay-Pihi	Please see General Response 1.
Dylan Pilger		2) The EIS drastically under-emphasizes the cultural significance of Pōhakuloa and did not investigate the impacts to health caused by historical trauma associated with the desecration of cultural sites. As Indigenous peoples Native Hawaiians are subject to unique health risks including historical trauma as a result of historical and ongoing cultural erasure, dispossession, and genocide. Conducting live-fire trainings near cultural sites and the lack of access to these cultural sites due to ongoing training and legacy contaminants poses a health risk to the Native Hawaiian community that must be addressed.	Discussion of the impacts on communities with environmental justice concerns from the Army's historical and current presence and mission activities is provided in Section 3.11.6. Section 3.4 discusses impacts to access associated with cultural practices.
Dylan Pilger		1) The EIS does not adequately investigate potential harm from the presence and use of PFASs on environmental and human health. PFAS use has been noted in the report	Section 3.5.4.13 revised with information from the Preliminary Assessment/Site Inspection report.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>"FINAL PRELIMINARY ASSESSMENT AND SITE INSPECTION OF PER- AND POLYFLUOROALKYL SUBSTANCES Pohakuloa Training Area and Kilauea Military Reservation, Hawaii" published by the Army. PFAS is known to be highly persistent in the environment, toxic even in low doses, and has been shown to bio-accumulate in aquatic animals, terrestrial plants, and humans. Historically, PFAS has been used at multiple sites in Pōhakuloa the health impacts of which have never been fully evaluated. Furthermore, live-fire training is a source of wild fires and necessitates the use of fire-fighting services which often make use of PFAS.</p>	<p>Questions or comments regarding the Preliminary Assessment/Site Inspection report conducted by the Army under Defense Environmental Restoration Program are outside the scope of this EIS; however, please note that the Preliminary Assessment/Site Inspection report investigated other sources of polyfluoroalkyl substances (PFAS) beyond aqueous film-forming foam (AFFF), including metal plating operations, photo-processing areas, wastewater treatment plants, pesticides, and landfills. The areas identified for further investigation in a Remedial Investigation are on U.S. Government-owned land, not State-owned land.</p>
Marisa Plemer		<p>No to extension of lease to Pōhakuloa for military training and yes to Army and federal cleanup of toxic pollution left by its usage in the past and present.</p>	<p>Please see General Response 1.</p>
Marisa Plemer		<p>I am against continuing use of Pohakuloa for military training purposes. I am for the restoration and clean-up ASAP of these Hawaiian lands which have been contaminated with toxic chemicals by the military. Sincerely, Marisa Plemer</p>	<p>Please see General Response 1.</p>
Kahakuhailoa Poepoe		<p>My name is Kahakuhailoa Poepoe. I come from 'Ualapu'e, Moloka'i, and I just wanted to talk about a little bit of my experience growing up, you know, because the two aunties that came before me, Laamaikahiki, is the one I know. And I wanted for mahalo for their 'olelo before for giving their experience, especially auntie before me because she was talking about how she was raised as an American. I was kind of different. Yeah. My -- my grandparents and my parents was raised American, but my tutu, she was one of the first who started the Hawaiian immersion on Moloka'i. So I was raised kind of with that mindset I'm not American. My papa was a part of the military. He was in the Vietnam War and explained to me, even though he was a part, you know, he's a veteran and he still go to all the veteran events and all of that, this country that is occupying us right now does not stand for, you know, liberty and justice and all of these things that they claim for. Because you just look at -- for me, my thing was I was raised fishing in Mo'omomi. I'm -- I come from Hui Mālama o Mo'omomi. I know he was asking for the</p>	<p>Please see General Response 1.</p>

Responses to Second Draft EIS Comments

Commenter	Submitted By	Comment	Response
		<p>organization, so I wanted for -- state that real quick. But I was raised fishing in Mo'omomi. And one of the main things that I was told, you know, when we go throw net in a place called Hinanaulua there is an island. Now -- we don't know the name of the island nowadays, but what we call it is Target Island because back in the days the military used to bomb it. And what I was taught from my papa is that when they used to go diving grounds over there back in the days had choke fish. And by the time, you know, when I was a kid, I -- I cannot go over there because of the dangers. You know, there's unexploded ordinances in the area and all of this kind of stuff. So I was never, you know, I -- I always had some kind of resent for the military and I always heard about Pohakuloa, but I was always kind of scared to come and speak up. But now I have no shame to say it's hewa because I, you know, and I was reading the posters and I only think that we can go for the fourth way of doing this, which is no access. The military has no access to PTA, to Pohakuloa Training Area. And I woke up to this ever since I went to Kaho'olawe this past spring break. Yeah. Because what I learned in Kaho'olawe is the military when bombed the shit out of that island and left the Hawaiians for clean them up because we're the ones doing all the work over there, you know? That's so funny to me that PKO and, you know, all of that kind of stuff, there's all kind of -- it's -- it's kind of detailed, but what I see is Hawaiians going to or people who is in support of, you know, our lāhui and our movement going to Kaho'olawe to clean that shit up. And what I hearing currently about Pohakuloa is none of it is going to be cleaned up and that, basically, there's no benefit in bombing our islands. You even seen your own charts. I mean, I'm not talking to you directly, but as the US Army, you know, as -- as delegates of them, I just want to say, look at the charts and what no access provides for us, even according to your research. I mean, personally, I think that the benefits of no access would be even further. But yeah, I just wanted to give my mana'o because now I'm not shame for give my mana'o and I just wanted for say, yeah, I don't agree and no access is the only way. And</p>	

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
		I -- I hope that all my Hawaiians in here agree; and not only just the Hawaiians but everybody else here in Hilo. So mahalo for letting me share my mana'o.	
Sherry Pollack		To whom it may concern: Speaking as a resident of Hawaii, I strongly oppose the Army's retention of any of the "State" lands at Pōhakuloa. I support the "No Action Alternative" that would allow the lease to expire and require the Army to comply with all lease terms that include the clean-up of these lands. The other alternatives are unacceptable as they continue the practice of Hawaiian land to be bombed, burned, and polluted. Thank you for this opportunity to provide comments. Sherry Pollack	Please see General Response 1.
Noelani Puniwai		No compromise. Too many negative impacts have occurred.	Please see General Response 1.
isabela ramirez		Demilitarize Hawai'i. The US military is illegally occupying the sovereign nation of Hawai'i. The damage and loss of native and indigenous species at the hands of the US military should be criminal. A'ole.	Please see General Response 1.
Nancy Redfeather	Ka Ohana O Na Pua	An additional consideration is the contamination of ground water serving communities at the lower elevations, contamination of soils from depleted uranium pieces and dust kicked up in the impact zone unknowingly (because you really don't know where all the DU lies) impacting both the soldiers and communities down wind, and the potential for ancient sites which have not yet been surveyed to be destroyed	The best available scientific data for groundwater and surface water quality was incorporated into this EIS. Water resources and applicable studies are discussed in Section 3.9. Sections 3.9.4.1 and 3.9.4.2 state a groundwater sample was collected in 2013 from the underlying deep aquifer at Borehole PTA-2. None of the analytes tested, including organic compounds, inorganic chemicals, microbiological constituents, and radiochemical parameters, were in exceedance of laboratory method detection limits. Based on these results, activities at PTA have not impacted groundwater quality. Text has been added in Section 3.5.4 to provide the results from this groundwater sampling event and further justify lack of impacts on groundwater quality from PTA activities. Sections 3.5.4.11 and 3.5.4.12 describe the lack of mobilization of munitions constituents, including DU, within soil, groundwater, and surface water. Section 3.6.4 addresses fugitive dust. Additionally, Sections 3.5.4.12 and 3.6.4 provide information on a 2009 airborne uranium monitoring program which concluded that DU had not impacted air

Responses to Second Draft EIS Comments

Commenter	Submitted By	Comment	Response
			<p>quality at PTA or the surrounding area. As noted in Section 3.5.4.12, per DoDD 4715.11, Environmental and Explosives Safety Management on Operational Ranges Within the United States, paragraph 5.4.9.2, high-explosive munitions shall not be fired into the same area as DU (e.g., the impact locations for these four ranges); therefore, the DU impact locations are not disturbed by explosive munitions associated with ongoing activities.</p>
Nancy Redfeather	Ka Ohana O Na Pua	<p>Wildfire has recently been designated as the greatest environmental threat to the Hawaiian Islands. Bombing ranges start wildfires. The communities of Waikoloa and Waiki'i are both at risk. This should be a major concern to the State of Hawaii and the Governor's Office.</p>	<p>In accordance with DoD Instruction 6055.06, DoD Fire and Emergency Services Program, and the PTA Integrated Wildland Fire Management Plan, PTA personnel implement procedures for prevention and suppression of wildland fires. This includes maintaining firebreaks and fuel breaks, which prevent fire from spreading. Within PTA, the roads serve as firebreaks to reduce the spread or contain a fire. DK1 Highway and Mamalahoa Highway serve as firebreaks that reduce the spread or contain a fire from spreading to Waiki'i Ranch and Waikoloa Village.</p> <p>Mitigation measures the Army proposes include (1) negotiation of an agreement with the State to monitor wildfires on land not retained and (2) implementation of additional thermal technology. These mitigation measures have been added to the Mitigation Measures subsection.</p>
Nancy Redfeather	Ka Ohana O Na Pua	<p>The Army has not been a responsible environmental steward of the Pohakuloa lands. In the Army's current Lease it states that the Army is required to "make every reasonable effort to remove or deactivate all live or blank ammunition upon completion of a training exercise or prior to entry by the said public, whichever is sooner." Has the Army complied with this lease provision and what were the steps taken and when to fulfill this promise? A thorough investigation of the entire area (not just 10%) should be undertaken to determine whether there is any military debris remaining and that would also include unexploded ordnance on any lands that have been used for training/exercises over the historical time period of your occupation. I know that over many years, there have</p>	<p>Section 3.5.4.11 states, "Military personnel endeavor to remove or deactivate all live and blank ammunition upon completion of a training exercise and prior to entry by the public in compliance with the lease and Pohakuloa Training Area Range Operations Standard Operating Procedures. Despite cleanup efforts, erratic bullets and gun components have been found."</p> <p>Sections 3.2.4 and 3.5.4 state that DLNR has implemented the Court Ordered Management Plan and site visits are occurring. The Army has received no corrective action requirements from the site visits.</p> <p>To address the potential for MEC on any State-owned</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>been many Cultural Monitors who spent extensive time on the Pohakuloa lands and have observed firsthand military debris, including unexploded ordinance and spent shell casings on the grounds of the lands leased by the Army.</p>	<p>land not retained after the lease expires and the land is removed from the Army’s inventory of operational ranges, the Army would perform cleanup and restoration activities in accordance with the Military Munitions Response Program, CERCLA, and the terms of the lease. Section 3.5.6 notes that following lease expiration and in accordance with the lease, or as otherwise negotiated with the State, the Army would conduct various lease compliance actions such as removing weapons and spent shells within the State-owned land not retained.</p>
<p>Nancy Redfeather</p>	<p>Ka Ohana O Na Pua</p>	<p>To whom it may concern, As the U.S. Army and others continue to analyze the PTA Environmental Impact Statement and begin to consider how future stewardship of the area will affect the US Armies desire to retain up to approximately 23,000 acres of state-owned land at Pohakuloa Training Area (PTA) for military training we are again at a crossroads. The public has again been invited to comment, this time commenting on the final EIS and and giving permission to the Chairperson of DLNR to seek fair market value for and negotiate a price for this fee simple State land with the US Army. I am opposed to the US Army purchasing, renewing their Lease, or swapping State conservation lands at PTA that are currently being used as a military training range. I am for a No Action Alternative. I’d like to share some of my reasons for this decision.From a Civil Beat article dated August 2022, it appears that DLNR Agency itself is in conflict: “It appears that military training is in direct conflict of the Conservation District designation” and “In their written comments, the Department of Land and Natural Resources castigated the Army for issuing a report that contains major data gaps, relies on outdated studies, fails to specify adequate mitigation, and falls short of meeting minimum requirements of Hawaii state laws.” This is not comforting information for the communities of Hawaii Island. It is my understanding that the area has been used for military training since 1943, and the state-owned land has been leased by the Army since 1964. PTA is the largest contiguous live-fire range and maneuver training area in the state and is located between Mauna Loa, Mauna Kea,</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		and Hualalai on the island of Hawaii. Of the 132,810 acres at PTA, approximately 23,000 are leased from the state. The current 65-year lease is set to expire in August 2029.	
Nancy Redfeather	Ka Ohana O Na Pua	Because I stand in opposition to the continued occupation of State conservation lands on Hawaii Island for military training exercises, I would like to briefly identify other points that should be seriously considered when making the decision to do a land swap, renegotiate the Lease, or sell fee-simple. Once the Military holds these lands fee-simple, without any controls through the Lease process, the State will be without recourse. The Red Hill contamination of the Oahu lens should give us all pause to reconsider. Times have changed, conditions have changed, we must change also.	Please see General Response 1.
Nancy Redfeather	Ka Ohana O Na Pua	Recently the Army has driven ungulates West from its leased lands, and down into the Waikoloa and Waimea area greatly affecting producing farms in those areas and requiring landowners for the first time to fence their acreage. That was not a responsible action. This action should concern everyone	<p>Sections 3.2.4.2 and 3.3.4.2 have been updated with additional information on public hunting and PTA game management. In compliance with the 2022 PTA hunting policy and iSportsman management, and pending training compatibility, the Army permits public hunting on PTA on weekends and national holidays.</p> <p>The Army has conservation law enforcement officers and game management support that work to control ungulates at PTA and support the hunting program. The Army would consider an ungulate impact assessment as part of the mitigation measures.</p> <p>Management of wild ungulates outside of the PTA boundary is beyond the scope of this EIS.</p>
Nancy Redfeather	Ka Ohana O Na Pua	There was a draft document titled: “Action Memorandum for the Time Critical Removal Action” prepared 3/2015 by the US Army Garrison at Heeler Army airfield on Schofield Barracks in Wahiawa, Oahu, Hawaii. The bazooka range at Pohakuloa was used as a military maneuver area through the early 2000s. During the joint DLNR/Army inspection in 2014, the area was found to be “heavily contaminated on the surface with potentially explosive materials and munition debris. 4 different types of ordinance were observed to be present.” 1.) M29A2 training rounds with dummy M405 fuses 2.) Practice 81mm mortars 3.) Other	Section 3.5.4.11 provides information regarding the 2015 active range management activities regarding MEC and lack of chemicals of concern at the PTA Former Bazooka Range, which includes the High Mortar Concentration Area. The text includes MEC and debris quantities from the Final Site Specific Final Report, Removal Action, Pohakuloa Training Area Former Bazooka Range, Island of Hawaii (February 2016).

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>high explosive anti-tank rifle grenades 4.) M28A2 bazooka rounds with M404 fuse 5.) M30 white phosphorus bazooka rounds. At that time the Army noted the number of ordinance present on the ground “coupled with the accessibility to the public make for the potential for significant danger to public health and welfare.” Estimated cost of clean-up in 2015 was \$2,353,000.00. The reason the Army recommended this clean-up was that it “presents an imminent and substantial endangerment to public health, or welfare, or the environment.” Was the clean-up effort accomplished, is it now safe for the public and the environment, what and how much waste was collected from the area, where was it disposed? This information should be of concern.</p>	
Nancy Redfeather	Ka Ohana O Na Pua	<p>Concerns still lingering from the 8/2018 EA Finding of No Significant Impact 1. I can see that a thorough evaluation of the potential ancient and historical sites has not been completed. There have been identified 1,198 sites, 822 have not been evaluated, and 364 are traditional Hawaiian sites, and that only 20% of the high impact zone has been evaluated. That no sacred sites were identified seems highly unlikely. This information should have affected the final determination of No Significant Impact. This is concerning. 2. The Hawai'i County Council has passed various Resolutions demonstrating concern about these potential impacts. Resolution 639-88 urges the military to address the potential hazards of DU at the Pohakuloa Training Area. This Resolution has 8 action steps including ceasing of live fire and clean up of DU that have not been adequately addressed in the past 9 years. This is concerning. The State of Hawai'i land lease does not allow for storage of nuclear storage on site, even though the NRC has given Pokahuloa a permit to possess DU on site. The Army has not been transparent with the public about the use of DU coated weapons being used currently on site. IF the Army is not using DU coated weapons and firing them at the Pohakuloa Training Site, you should tell the public. That would make a huge difference in many peoples minds of how they view your continued presence here. This is very concerning.</p>	<p>Section 3.4.4 has been revised with a better explanation of studies and associated constraints for historic and cultural resources and cultural practices. The Finding of No Significant Impact for an Environmental Assessment is not applicable to this EIS.</p> <p>Section 3.5.4.12 includes information about depleted uranium and associated studies at PTA (i.e., archival research, site reconnaissance, radiological instrumentation, soil sample results, health and risk assessments). The only depleted uranium-containing/coated munition used at PTA was the Davy Crockett Weapon System M101 spotting round, which the Army used at PTA between 1962 and 1968. The text states that current Army and DoD regulations prohibit the use of munitions that contain depleted uranium in training .</p> <p>Section 3.5.4.12 states that surveys found no indication of depleted uranium-containing materials on the State-owned land. The M101 spotting rounds were fired at four impact locations that are in the impact area (U.S. Government-owned land).</p>

**Responses to Second Draft EIS Comments**

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Nancy Redfeather	Ka Ohana O Na Pua	In Summary: Personal Observations: I am a farmer and retired educator who has lived in Kona for the past 50 years. I live in the Kawanui Ahupua'a of Kona at the 1,500 ft. elevation and many times over the past 25 years my house has shook from the ordnance that has been used at Pokaukoa. I have also been out on my farm and literally felt the earth shake under my feet. Can this possibly trigger earthquakes or shift movements of magma beneath the surface? I would like to see any seismic and geological information that was collected from the EIS. Thank you for taking all these concerns under consideration. I will look for updates on this process in our local news, unless you of course wish to update the stakeholders in a timely manner. Mahalo for considering these points. Sincerely, Nancy Redfeather Kawanui, Hawai'i	Section 3.8 of the EIS discusses geology, topography, and soils, including volcanic and earthquake hazards at PTA. Studies incorporated by reference can be found in Chapter 6 of the EIS as well as the PTA EIS website ( <a href="https://home.army.mil/hawaii/ptaeis/project-home">https://home.army.mil/hawaii/ptaeis/project-home</a> ) under the "Documents" tab. The analysis provided in Section 3.8.6 notes that the rate of volcanic eruptions and seismic hazards (i.e., structure damage by ground shaking, subsidence, liquefaction of sand or soil, or strong surface waves making the ground heave and lurch) would not change from the Proposed Action.
Brenda Reichel		Please clean up the land and return by 2029 when the lease ends. Included all lands ceded.	Please see General Response 1.
Michael Reimer		It is unfortunate (in subsection 2.2.5) that alternatives 4, 5, and 6 are not covered in greater detail, while it is certainly common practice for the preparer of an EIS to show in favor of the action desired by the contractor, this omission gives the appearance of a predisposition and inhibits the full scope of presentation. Some alternative actions may have provided welcome concepts for discussion and any possible negotiation regarding a proposed action.  The first sentence of the ES.1 section should state that this is a draft EIS. This issue should be made clear that this is indeed a draft EIS and not confuse that issue by omitting the word "draft" when referring to this document of March 2024, in section ES.1 as well as other sections.	Section 2.2.5 notes that Alternatives 4, 5, and 6 were considered but not carried forward for detailed analysis because they do not meet elements of the purpose and need statements for the Proposed Action (Section 1.3) and do not adequately meet one or more of the screening criteria presented in Section 2.1.4.  Section 2.2.6 added and Table 2-2 revised to consider other alternatives mentioned by the public during the Second Draft EIS public review period and previously addressed in the Analysis of Alternatives Study (2017). These alternatives do not meet the purpose and need of the Proposed Action (retention of the State-owned land) and do not meet the screening criteria presented in Section 2.1.4; therefore, they are considered and eliminated from detailed study in the EIS.  The Cover Page and every page header identified the Second Draft EIS as a Second Draft EIS.
Michael Reimer		There seems to be some confusion introduced in this second draft on what is the proposed action in relation to the alternatives as it is explained in Section 2. Section 2 is	The Army's Proposed Action is retention of up to approximately 22,750 acres of State-owned land at PTA. Alternatives 1, 2, and 3 are action alternatives (as

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>titled "Description of the Proposed Action and Alternatives," indicating two separate categories. The original proposed action in the 2022 draft EIS was continuation of the lease of state land for the full 23,000 acres. This seems to have been replaced with a refined proposed action in giving up a minimal 250 acres of the 23,000 acres of state-owned and leased land. However, in this second draft EIS, Table 2-2 lists alternatives excluding the no-action alternative. Alternative 1 is complete retention less the 250 acres, alternative 2 is modified retention, and alternative 3 is minimum retention and access. There are three other alternatives listed, 4 through 6, but not explained in detail in later sections. The no-action alternative is not included in this table but is in Table ES-3. It would appear that the now refined proposed action is incorrectly defined as an alternative. This second draft EIS states in Section 1.1, Introduction, "Therefore, U.S. Army Garrison-Hawaii (USAG-HI), the Army entity responsible for management of PTA, proposes to retain up to approximately 22,750 acres of the 23,000 acres of the State-owned land at PTA in support of continued military training." This seems to be the refined proposed action and is listed as an alternative (Alternative 1) in Table 2-2. Section 2.4, Preferred Alternative, clearly states that "The Army's Preferred Alternative is Alternative 2." That seemingly is in direct contradiction of the statement in the Introduction, Section 1.1, where the statement indicates the modified retention preference (by replacing the full retention in the first draft EIS) is not an alternative, but it is mistakenly labeled as Alternative 1 in Table 2-2. Alternative 2, according to Table 2-2, is a modified retention, described and explained in Section 2.2.2 as "Alternative 2: Modified Retention: Under Alternative 2, the Army would retain approximately 19,700 acres (86 percent) of the State-owned land at PTA, including all U.S. Government-owned facilities, utilities, and infrastructure within the State-owned land retained." This is also confirmed with the same wording in Section ES.8.2.</p> <p>The conclusion to be taken then from this second draft of</p>	<p>opposed to the No Action Alternative) that satisfy the purpose of and need for the Proposed Action and fully or partially satisfy the screening criteria. The Army's preferred alternative is Alternative 2.</p> <p>Land retention negotiations, including compensation for future use of the State-owned land, will be initiated following completion of the NEPA/HEPA process.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>the EIS is that the U.S. Army wants to retain only 19,700 acres of leased land as its preferred alternative, that is, Alternative 2. That makes a significant difference in fair market compensation for the leased land benefiting the Army. Using the extremely fair consideration of agriculture land lease payment of \$200 per acre per year rather than a higher business or commercial use categorization, the preferred alternative would go from Alternative 1, maximum retention of 22,750 acres to Alternative 2, modified retention of 19,700 acres, or from \$4.55 million to \$3.95 million, in keeping with the U.S. Army's desire to be cost-effective (Screening criterion item 5 in section 2.1.4 and Table 2-2). The issue of fair market lease value is not covered adequately in this second draft EIS.</p> <p>It is now stated that the Army's preferred action is Alternative 2, the retention of 19,700 acres as explained in Section 2.2.2.</p>	
Michael Reimer		<p>I am pleased to provide commentary on the ARMY TRAINING LAND RETENTION AT POHAKULOA TRAINING AREA SECOND DRAFT ENVIRONMENTAL IMPACT STATEMENT VOLUME I: EIS DOCUMENT POHAKULOA TRAINING AREA, ISLAND OF HAWAI'I, HAWAI'I, March 2024. I thank the U.S. Army for providing the opportunity to do so.</p>	Please see General Response 1.
Michael Reimer		<p>The Executive Summary of draft 2 provides a very succinct and revealing table ES-3 in section ES.9. This table summarizes four categories of 16 different named environmental resource impacts for Alternatives 1-3 (maximum retention, modified retention, and minimum retention, respectively), and the no-action alternative. Those four impact categories are: significant adverse impact; significant adverse impact but could be reduced to less than significant impact; less significant impact; and significant beneficial impact. In addition, Alternatives 1-3 have a further refined impact resolution for three types of consideration of land retention explained as follows:                      "With the exception of utilities, which does not include a separate analysis of land not retained because impacts would extend beyond the State-owned land, significance</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>impacts for the action alternatives are presented for lease, fee simple title, and land not retained impacts (presented as lease impact/fee simple title impact/land not retained impact).”</p> <p>Including that subcategory land holding impact, the table is revealing in that the only alternative to have 3 significant beneficial impacts is the no-action category while Alternatives 1, 2, and 3 each have 2 beneficial categories, ironically those categories fall within the “land not retained” grouping, which is equivalent to the no-action alternative where the lease and land use is not renewed. The 3 environmental resource impacts of significant adverse impact for the no-action alternative are: Biological Resources, Socioeconomic Resources, and Utilities.</p>	
Michael Reimer		<p>COMMENTS:</p> <p>The purpose of this second draft Environmental Impact Statement (EIS) as stated in the last paragraph of ES.1 Introduction is: “This Second Draft EIS presents a refined Proposed Action from that published in the PTA Draft EIS (April 2022). Rather than seek to retain up to 23,000 acres, the full acreage currently leased by the U.S. Government at PTA, the acreage has been reduced by approximately 250 acres of State-owned land administered by the DLNR. Based on comments on the Draft EIS from agencies and the public, the Army is no longer considering retention of these 250 acres. There are, of course, many other revisions included in this second draft that suggest other alternative actions, most notably in section E.12 and expanded in 5.2.1, where a fee-simple land exchange of government-owned land for state-leased land is suggested. Because no information is included identifying the government-owned land that is proposed for the exchange, the relevance of this second draft EIS is diminished. This proposition as presented by the U.S. Army in this second draft EIS seems more akin to a bait-and-switch offer—extend the lease and maybe it will think about land exchange. From Section E.12, “Because this is in very preliminary stages of planning, any land exchange</p>	<p>The EIS does not propose a land exchange. Rather, it notes that land exchange has been identified as a potential process to use during land retention negotiations, which would occur after the Record of Decision is published. Environmental impacts from the Proposed Action (Army retention of State-owned land at PTA) are analyzed under lease and fee simple title as discussed in Section 2.3. Fee simple title represents the largest bundle of ownership rights possible in real property; and may be accomplished through a land exchange, which would require additional NEPA and HEPA analysis.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		would be addressed through separate future planning and environmental compliance processes.”	
Michael Reimer		<p>The second draft EIS paints a doom-and-gloom scenario because of limited access to the federal land for any other than the preferred action, but this is simply an unconfirmed scenario. Rights of way to various government-owned parcels can always be negotiated, especially through state-leased parcels 17 and 18 (see Figure 1-3). Access to utilities can always be maintained. The remaining government-owned land will presumably still be used for training, so the economic picture is not nearly as dire as this EIS claims. While there are numerous sections in this EIS where the military claims to provide substantial monetary benefit to the state, what is clearly lacking is the cost to the State and County as a result of the taking of resources related to the training activities. If there is a fee simple ownership granted to the Army of some of the current leased land, what is to prevent the anytime blockage or sequestration by the Army of Daniel K. Inouye Highway and Old Saddle Road and prevention of its use by the County?The Daniel K. Inouye Highway, routed through the current leased land at PTA, is a major east-west connector for the Big Island. This is an essential connector for the two sides of the island in case of some natural disaster that would disrupt traffic flow on either the northern route with many vulnerable bridges or the southern route with numerous historic lava flows cutting the existing route; the road through the saddle remains the only practical alternative route. The County and State would have no control over this section of the Daniel K. Inouye Highway if that land is owned by the U.S. Army, even if there is a right of way agreement. That the U.S. Army is prepared to act in a truculent manner with regards to their control of the leased land was explicitly shown in the Draft Environmental Impact Statement of April 2022 when it indicated it would no longer provide first responder assistance for fire and accidents and other necessities in the vicinity of PTA and the Daniel K. Inouye Highway if the lease were not renewed.</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

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Michael Reimer		<p>It is important that this issue of land exchange be addressed in adequate detail so that concerns about the good-faith propriety can be included in any evaluations of this additional alternative action. Because it is introduced here, it needs more detail to become part of consideration of other actions. Times past do not manifest a credible and honorable result of government land transactions involving indigenous peoples. They reflect a history of exchanging worthless land, broken treaties, and betrayed promises. These accounts do not reveal equitable actions on government proposals of land exchanges. Some egregious land offerings involving indigenous peoples and the impact they had are still present in today's demographics of the U.S. Simply note the Trail of Tears where indigenous peoples were given worthless "Indian Territory" in Oklahoma and forced to move there, generating much sickness and death on that forced relocation; review the Treaty of Fort Laramie where the Black Hills were given to indigenous peoples and the military intervened to help break that treaty when it was found to be not so worthless; in Hawai'i's own backyard, recall the action of the government participation in the overthrow of Hawai'i's monarchy in 1893 and continuing with the example of Kaho'olawe, as land pulverized and contaminated by the military, and then returned after an incomplete effort at restoration. When considering any Socioeconomic and Environmental Justice Resources, the EIS preparers must be aware of the past harm caused by disingenuous land exchanges and realize the necessity to have respectful sensitivity to the concern such proposed actions can bring. The Ke'amuku parcel owned by the government seems to have most of the properties the leased land has that the Army says it needs to meet its training requirements. There is soil for training that it says it needs; and rights of way could be established to the impact areas and to the airfield. The firing points currently on the leased land could be moved to the northern boundary of the military-owned impact areas with less than 2 miles distance lost. The approximate north/south distance of that impact land is about 15 miles, and the</p>	<p>The EIS does not propose a land exchange. Rather, it notes that land exchange has been identified as a potential process to use during land retention negotiations, which would occur after the Record of Decision is published. Environmental impacts from the Proposed Action (Army retention of State-owned land at PTA) are analyzed under lease and fee simple title as discussed in Section 2.3. Fee simple title represents the largest bundle of ownership rights possible in real property; and may be accomplished through a land exchange, which would require additional NEPA and HEPA analysis.</p>

**Responses to Second Draft EIS Comments**

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		<p>leased land only adds about 2 miles to that. The distance difference is minimal if not inconsequential. The Ke‘amuku parcel could replace the leased land, and the no-action alternative would stand out as the superior alternative. In addition, the Army, if it chose to do so, could still provide programs it says it would terminate (in section 2.2.4) if the no-action proposal is adopted: “No longer fund or manage resource management actions and public use programs in the State-owned land after lease expiration.” There is no reason these programs could not be continued on a new location such as the Ke‘amuku parcel. If the Ke‘amuku parcel is to be exchanged for the leased land, then it may also be beneficial and cost-effective to the Army as it has already made some improvements to the existing cantonment area on leased land. Figure 3-14 only shows soils on State-leased land at PTA. It would be good to provide a soil map for the entire PTA area including government-owned lands. That would show that there are other soils available for training activities besides those on the leased lands and make moot the comment about needing soils for training that are suggested to be solely limited to leased lands. The recognition of soils on the Ke‘amuku parcel was noted in previous comments made on a former draft EIS. If this second draft included such a map, it would show soil availability at locations on government-owned land. This would indicate that the reason given in Section 1.1 Introduction is not completely accurate.</p>	
Michael Reimer		<p>In 2.2.4, the statement, “Army expenditures supported 75,920 employees (i.e., military personnel, civilians, contractors) in the State, 1,962 of which were in the County of Hawai‘i. Army expenditures also accounted for approximately \$4.48B in labor income (i.e., military personnel, civilians, and contractors) in the State, \$92M of which was in the County of Hawai‘i (USACE-POH, 2019).”</p> <p>These data are from a study in 2016. This seems particularly contradictory to its statement from ES.10 Cumulative impacts, that “For most resources, the impacts of past actions are a part of existing conditions.” It is</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>proper here to recall the standard caveat of any claim of financial performance: “Past performance is not a reliable indicator of future results.”</p> <p>Employees will still be hired, and construction and maintenance will still continue. With the continuing buildup of toxins, MEC and UXO, where is the responsibility and estimate for restoration of the land when it is abandoned by the military, as happened with Kaho‘olawe?</p>	
Michael Reimer		<p>There is a major issue concerning this second draft EIS. It is that many items discussed here are not fully vetted. There is a tendency in this draft concerning the expiration of the lease of state-owned lands at PTA to repeat misinformation of earlier EISs and other documents that now, unfortunately, has become disinformation. To demonstrate that I will comment on Section 3.5, specifically 3.5.4.12, Radioactive Materials. This section stands out from those in Section 3.5 because it is the longest subsection, so it must be of some specific concern. Section 3.5.4.11, Military Munitions and Munitions and Explosives of Concern, is the second longest section.</p>	Please see General Response 1.
Michael Reimer		<p>The first part (three paragraphs) of section 3.5.4.12 describes the use of depleted uranium (DU) at PTA from the Davy Crockett weapon that was designed to deliver a small nuclear explosive in a combative battlefield engagement. The Davy Crockett system was used at PTA for training, but there is no evidence that a nuclear detonation ever took place at PTA. Natural uranium atoms consist of three isotopes, called U-234, U-235, and U-238. That indicates a uranium atom with 92 protons in the nucleus but with different numbers of neutrons. Depleted uranium is natural uranium from which some of the fissionable isotope U-235 (and some U-234 because the separation process is not exact) has been removed. The remainder metal is called DU and still contains some of the fissionable isotope U-235. It’s still a heavy metal with the same chemical toxicity as natural uranium and is still radioactive. It is just that one of the isotopes, the one that is used for the atomic fission bomb, has been separated</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		somewhat from inherently occurring isotopes in natural uranium. That enriched separated uranium product is called enriched uranium, or EU.	
Michael Reimer		The Davy Crockett system, which could use a uranium-based fissionable explosive, was delivered to various military facilities for training (Hawaii and various mainland military bases) and to some forward military bases (e.g., Germany, Korea) as deployment for defensive weaponry. The first paragraph states that DU is 40 percent less radioactive than naturally occurring uranium. This is an entirely misleading statement and intentionally designed to downplay the risk of radiation from this form of uranium. That statement is true only for the instant that the fissionable isotope is removed from DU and depends on how much of that isotope is removed. Within a year, the ingrowth of radioactive progeny increases and regains half of the reduced radioactivity that also includes the release of gamma and beta radiation in addition to the alpha radiation of natural uranium. In addition, DU manufactured from spent atomic power plant fuel is known to be contaminated with other radioactive isotopes produced in the reactor operation, including plutonium, neptunium, and other reactor-made uranium isotopes, although that amount contributes probably less than 1 percent of the total radiation.	Please see General Response 1.
Michael Reimer		Section 4.4.2 provides a discussion on Biological Resource impacts for Alternatives 1, 2, and 3, but does not include a discussion of the no-action alternative. Therefore, there is no justification for placing a significantly adverse assignment to the no-action alternative for this resource in Table ES-3. The discussion of the no-action alternative in section 2.2.4 includes comments that the Army would: “No longer fund or manage resource management actions and public use programs in the State-owned land after lease expiration.” “Meet ongoing biological resources mitigation requirements (e.g., conservation fence units) in the State-owned land via reforestation of portions of the State-owned land or some other arrangement negotiated with USFWS and State, as applicable.” It seems unreasonable to intimate that the State and County would	Section 4.2 explains the methodology for the cumulative impact analysis. The analysis of cumulative impacts does not include analysis of the No Action Alternative. Section 3.3.6.4 provides an analysis of impact and the level of significance for the No Action Alternative. Section 3.3.5 provides the assumption that the State would continue current levels of species and habitat protections within State-owned land not retained.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>not have the capability to manage its biological resources after the discontinuation of leased land. In point of fact, there would be lower risk to habitat availability from wildfire risks and other habitat destruction occurring from Army training activities. Also, in that same section, the Army states that with the no-action alternative, it would: “Meet ongoing biological resources mitigation requirements (e.g., conservation fence units) in the State-owned land via reforestation of portions of the State-owned land or some other arrangement negotiated with USFWS and State, as applicable.” “After the lease expires, and if deemed necessary, the Army would follow Army regulations to determine how and when cleanup and restoration activities for any hazardous substances and hazardous wastes, including MEC, within the State-owned land would occur under the CERCLA process. The Army would coordinate these actions with DLNR and the DOH Hazard Evaluation and Emergency Response Office.” This could only improve the habitat and resources by continuing some biological resource activities and performing cleanup activities. Therefore, the claim of significant adverse impact in table ES-3 for the no-action alternative is misrepresented and should be transposed to a significant beneficial impact category.</p>	
Michael Reimer		<p>The Army claims that the only DU present at PTA is from the Davy Crockett system.</p> <p>DU has been used in many other munitions, however, including cannons on aircraft, artillery projectiles, and even small arms ammunition. It is also used as armor shielding in some battlefield vehicles (e.g., tanks) because it is a very dense metal. It is unknown if other DU munitions have been used at PTA.</p>	<p>Section 3.5.4.12 states the only depleted uranium-containing/coated munition used at PTA was the Davy Crockett Weapon System M101 spotting round, which the Army used at PTA between 1962 and 1968.</p>
Michael Reimer		<p>Any theoretical or epidemiological study determining radiation hazard or risk from DU exposure is faulty if it uses the input parameter of DU posing less risk because of its decreased radioactivity at the time of purification. This section also states that, about the DU spotting rounds (to guide the aiming of the nuclear explosive warhead of the Davy Crockett system) used at PTA, “The spotting rounds</p>	<p>Section 3.5.4.12 includes information about depleted uranium and associated studies at PTA (i.e., archival research, site reconnaissance, radiological instrumentation, soil sample results, health and risk assessments). The best available scientific data for depleted uranium at PTA was incorporated into this EIS. Sections 3.5.4.12 and 3.6.4 contain a discussion on</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>did not aerosolize on impact and did not generate a cloud of DU-rich dust particles.”The issue of aerosolization is an important one for the distribution of DU at PTA. To aerosolize is to convert material into small particles. The distribution of small particles by the air is probably the greatest mechanism of dispersing DU at and from PTA. Aerosol particles, those that can be transported in the air, have an aerodynamic size range from 0.001 to 10 micrometers. The average diameter of a human hair is about 50 micrometers. The particles are not always perfect spheres or the same size. There are many ways they can be formed from larger particles. If you take a hard brittle object and throw it at another hard brittle object, it can break and may form some dust from either material composed of small particles. That can happen with DU projectiles. It is shot from the Davy Crockett weapons system and hits hard lava, and sometimes it will break into smaller fragments. This breakage was seen at PTA in a scoping survey performed by a contractor, Cabrera Services, designed to find DU at PTA, where the spotting rounds were found on the surface, and will be discussed later in this commentary. The formation of aerosol particles upon impact may not be great, but some can be formed. There are other mechanisms that can create even more DU aerosol particles at PTA.</p>	<p>depleted uranium and the Army's 2009 air quality monitoring program, which concluded that depleted uranium had not impacted air quality at PTA or in the surrounding area.</p>
Michael Reimer		<p>When the ground scoping surveys were conducted by the contractor Cabrera Services, spotting rounds were found, often with oxidized uranium on the body of the round or fragments. Some complete spotting rounds were found as well as spotting round fragments. There were also tail assemblies from main warheads found that seemed to have DU oxide coating on them. The relevance of this discovery will be mentioned later in this commentary. Many of the DU particles had tell-tale signs of yellow oxidized depleted uranium. Oxidized depleted uranium has a different chemical reactivity than depleted uranium. Those aerosol particles are very insoluble and can reside in the lung for long times.</p>	<p>Please see General Response 1.</p>
Michael Reimer		<p>The introductory part of this section also makes a statement in Paragraph 3 concerning those oxidized</p>	<p>Section 3.5.4.12 includes information about depleted uranium and associated studies at PTA (i.e., archival</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>particles that: “These particles are 3 to 6 times denser than soil particles and not easily mobilized by wind.” That may be true for large DU fragments, but that statement absolutely overlooks the science of how small particles are mobilized and move in air. Anyone who has seen dust particles in a beam of sunlight suspended in the air, seemingly defying gravity, is aware that small particles can be suspended for a long time and actually move in air. Here, the second draft EIS paragraph 3 statement is used to intentionally mislead the draft EIS readers into thinking that DU is so heavy that it cannot move very far and so, by inference, it cannot present any hazard. On the Big Island of Hawai’i, residents are very aware of the volcano eruptions and particles that have traveled tens of miles to the leeward side of the island creating VOG and the respiratory problems they can create. When the wind is in the right direction, this VOG can even travel to other islands, such as Maui and Oahu. People are also aware of how smoke from forest fires can travel hundreds of miles on the mainland, polluting vast areas with smoke particles. Small particles, including those created by various mechanisms that can create particles from DU, can travel great distances— even thousands of miles are common for desert sands caught up in strong winds.</p>	<p>research, site reconnaissance, radiological instrumentation, soil sample results, health and risk assessments). The best available scientific data for depleted uranium at PTA was incorporated into this EIS. Sections 3.5.4.12 and 3.6.4 contain a discussion on depleted uranium and the Army's 2009 air quality monitoring program, which concluded that depleted uranium had not impacted air quality at PTA or in the surrounding area.</p>
Michael Reimer		<p>As previously mentioned, other mechanisms can produce aerosolized particles from DU at PTA. It is necessary to consider the actual environmental conditions at PTA. Small particles in the aerosol range and subject to airborne transport can be released by many actions. While the EIS states the Army no longer intentionally uses high explosives in the areas where DU fragments were found to be located, this was not always the case. Pictures taken by the contractor, Cabrera Services, show there are numerous fragments on the soil at the PTA impact sites. Nearby explosions to these fragments could produce the sub-micronized particles that could become readily airborne. In addition, when the spotting rounds hit a surface, there was a small ignition from a red phosphorus reservoir in the spotting round that would ignite to provide visual confirmation of the impact location. Upon</p>	<p>Section 3.5.4.12 includes information about depleted uranium and associated studies at PTA (i.e., archival research, site reconnaissance, radiological instrumentation, soil sample results, health and risk assessments). The best available scientific data for depleted uranium at PTA was incorporated into this EIS.</p> <p>Sections 3.5.4.12 and 3.6.4 contain a discussion on depleted uranium and the Army's 2009 air quality monitoring program, which concluded that depleted uranium had not impacted air quality at PTA or in the surrounding area.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>ignition, red phosphorus converts to white phosphorus that produces temperatures of about 815°C. Uranium ignites at about 600°C. It is likely that the burning phosphorus could cause those temperatures, and the burning DU would create particles that could be carried by the rising heat plumes and be transported in the air. Uranium, including depleted uranium, is pyrophoric, meaning it can spontaneously ignite upon exposure to oxygen in the air. This spontaneous ignition can occur more readily in smaller pieces of DU; larger particles can ignite when exposed to high temperatures and pressures. This means that particles are released during burning and rise in plumes with the hot air created by the fire. This would carry small respirable-size particles great distances from the location of the DU fragment in the plume created by the explosion. "These fine dust particles can catch fire spontaneously in air. Small pieces may ignite in a fire and burn, but tests have shown that large pieces, like the penetrators used in anti-tank weapons or in aircraft balance weights, will not normally ignite in a fire." Such conditions are present when DU fragments, large or small, on or near the surface would be near an exploding artillery projectile used in training exercises. This means that DU particles released during burning can rise in plumes with the hot air created by the fire or proximal explosions creating plumes. This would carry small respirable-size particles great distances from the location of the DU fragment by both the blast and by the plume rising into the atmosphere, and the debris in the plume can be carried by the wind great distances. While the EIS states the Army no longer intentionally uses high explosives in the areas where DU fragments were found to be located, this was not always the case. Pictures taken by the contractor, Cabrera Services, show there are numerous fragments on the soil at the PTA impact sites. These would produce the micron and submicron-sized respirable particles that even with normal weather actions could become airborne.</p>	
Michael Reimer		Saltation is another mechanism that releases small particles from the fragments. That is the movement of	Section 3.5.4.12 includes information about depleted uranium and associated studies at PTA (i.e., archival

**Responses to Second Draft EIS Comments**

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		<p>hard particles like sand driven by the wind over a surface. When they strike an object, they abrade it and smaller particles are formed. Consider that effect to be like sand blasting. Another mechanism is oxidation. Many people are familiar with that when iron rusts and forms a reddish color, fine-grained coating on the original material. DU oxidizes in different chemical forms from yellow to brown or almost black, and that coating, like iron rust, is friable, meaning it can flake off the original material. Wind, precipitation, exposure to a wildfire, walking on it, running over it with a vehicle are all activities that can release the oxidation particles. The oxidized particles with their different chemical nature and physical form can also flake off or spall from the larger fragments of DU simply from temperature changes. Those particles are typically within the aerosol size range, are quite mobile, and are respirable with a long residence time (years) in the lower part, the alveolar region, of the lung. When an aerosol becomes airborne, it can travel a large distance in the wind. How far depends on the strength of the wind, the height of the plume, the size and weight of the particle, and how the aerosol might react physically or chemically in the atmosphere. Some aerosol sands from deserts in Mongolia and Africa are carried by wind currents to Hawaii and the Caribbean, respectively. Even aerosols that resettle to the ground can be resuspended with very little force, even just by walking over the ground. Resuspension can occur repeatedly for single particles. Aerosols of DU released from exhaust stacks (smokestacks) at a DU fabrication plant in Colonie, New York were found in soils over 5 kilometers (three miles) from the plant. Residents living there and subject to inhalation of those released aerosols still, after 20 years, have measurable DU in their urine. As mentioned previously, when particles are no longer airborne and settle on the ground or other surface, they can become resuspended. As an example of how dusty it is at PTA and how surface particles can become airborne, look at the pictures of the abrasion on the rotors of the helicopter that was used in the scoping surveys at PTA sites.</p>	<p>research, site reconnaissance, radiological instrumentation, soil sample results, health and risk assessments). The best available scientific data for depleted uranium at PTA was incorporated into this EIS. Section 3.5.4.12 notes that the oxidized particles likely washed into crevices between exposed lava flows where they weakly bonded with iron-rich particles naturally occurring in the soil. Therefore, saltation is likely not a concern. Sections 3.5.4.12 and 3.6.4 contain a discussion on depleted uranium and the Army's 2009 air quality monitoring program, which concluded that depleted uranium had not impacted air quality at PTA or in the surrounding area.</p>

**Responses to Second Draft EIS Comments**

Committer	Submitted By	Comment	Response
Michael Reimer		<p>As part of the Army scoping surveys, air samples were collected to determine if DU particulates were being distributed from the DU fragments and small particle release mechanisms described here. A comment in this EIS section 3.5.4.12 describing these states: "Fugitive dust downwind of the ranges was suspected to have higher than average levels of uranium. The Army completed a 1-year airborne uranium monitoring program in 2009-10 to determine if the decay and vaporization of DU fragments have impacted local air quality. The monitoring program collected 210 air samples from three sites upwind and downwind of PTA to provide a basis of comparison. The monitoring program concluded that the DU had not impacted air quality at PTA or in the surrounding area because the total airborne uranium levels in the collected particulate matter samples were within the range of naturally occurring uranium in Hawaiian soils and rock and were several orders of magnitude below the U.S. and international chemical and radiological health guidelines (USACE-POH &amp; USAG-HI, 2010)." This is an example of how this EIS intentionally misleads the reader that DU is not a concern. First, this study did not look for DU. It only looked for uranium. Second, the samples collected in this study were not collected during times of the use of high explosives in the impact areas of PTA when radioactive particulates would have most likely become airborne. Third, the uranium isotopes that may have revealed if DU was present were below the analytical method's detection limit. It's not the total amount of uranium that is of concern but the amount of DU that is of concern. Natural uranium is likely to be included as individual atoms in either the crystalline mineral dust or attached to some organic form. DU is likely present as individual oxide particulates containing tens to hundreds of thousands of individual uranium atoms. This is an important point. Although a theoretical study had been done showing radiation exposure from estimated DU at PTA for hypothetical people in various occupations at PTA, the study minimized the inhalation situation. However, from inhalation exposure, it is the lung cells that are subject to</p>	<p>See Section 3.5.4.12 and 3.6.4 for discussion on DU and the Army's 2009 air quality monitoring program which concluded that DU had not impacted air quality at PTA or in the surrounding area.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>radiation from an inhaled particle. The impact to adjacent cells from radiation released from an insoluble DU oxide particle residing for years in the lung can be significant. The report focuses mostly on the chemical effect of exposure to uranium and not on exposures to radiation. Cells may be unaffected by radiation exposure, can die from it, or mutate and pass those mutations onto subsequent generations of cells.</p>	
Michael Reimer		<p>The Radioactive Materials section presentation is an example of how misinformation is cascaded to provide inadequate evaluations of alternative courses of action for continued land lease renewal. That process may well be representative of other sections in the draft EIS, and it indicates the entire second draft EIS for PTA for this purpose is unreliable in suggesting minimal impact for the preferred action alternative and must be discounted.</p> <p>The no-action alternative is the superior alternative. Implementing that alternative would result in the cleanup of the existing toxins at the state-leased lands. For the depleted uranium example, the methods used to determine transport are insufficient to properly quantify the impacts. This seems an intentional "do not look and you shall not find" scenario as better methods for selecting sample sites and making analyses are known and available. It is undisputed that DU is present at PTA, but these comments are presented here not as an issue of absolute health risk but as an example of what may seemingly be an intentional attempt to avoid a comprehensive and thorough means of collecting and presenting information throughout this second draft EIS, thereby improperly forcing a preferred conclusion.</p>	Please see General Response 1.
Michael Reimer		<p>In another study cited in this second draft EIS, (HQDA 2009), samples were collected that did some uranium isotopic analyses. The Army states that the presence of DU would be indicated if the uranium-234 isotope were lower than the uranium-238 isotope. The table shows that for many samples, the U-234 isotope activity is lower than the U-238 isotope (section 4.1 of that reference). While the Army may claim that this showing is a result of analytical</p>	<p>Section 3.5.4.12 includes information about depleted uranium and associated studies at PTA (i.e., archival research, site reconnaissance, radiological instrumentation, soil sample results, health and risk assessments). The best available scientific data for depleted uranium at PTA was incorporated into this EIS.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>uncertainty, it's because it has intentionally chosen an analytical method that lacks sufficient sensitivity. There are numerous analytical methods that have sufficient sensitivity to discern, but the Army has chosen to ignore them. The Army then specifically chose to set the definition so high for using this isotopic ratio as an indicator for the presence of DU that even when DU is present, it would not meet this unreasonably high definition. It then becomes easy to say that this method was accepted by other agencies that reviewed the program when it must be kept in mind that those other agencies were given the same misinformation as presented in this second draft EIS that leads to the fewer significant impact evaluations than actually exist.</p>	
Michael Reimer		<p>There is an even more egregious sampling program at PTA being run by the Army. In this section, the EIS contains an explanation of an ongoing sampling program related to an environmental radiation monitoring plan that is mentioned numerous times in this draft EIS. In this outrageous perversion of the plan, it discusses an ongoing collection, and analytical scheme.</p> <p>The samples collected are sediment samples from what is described as an ephemeral stream, but there is a lack of surface water features because of “low rainfall, porous soils, lava substrates, lack of groundwater wells near the DU impact locations, and great depth to groundwater.” If any preparer of this EIS had even a semblance of geologic knowledge or scientific curiosity, they would have immediately seen the absurdity of this section. There is absolutely no evidence that there is any connection between the sample site and the contamination site. In fact, the chance of water flowing that distance is reported to be unlikely as reported several times in this draft EIS. “The continued long-term, minor, adverse impacts on the environment from pollutant migration due to erosion and runoff from training would have a less than significant impact as stormwater runoff is infrequent and tends to rapidly infiltrate into crevices of the highly permeable lava flows.” For example, in section 3.5.6.1: “The continued</p>	<p>See Sections 3.5.4.12 and 3.6.4 for discussion on DU and the Army's 2009 air quality monitoring program, which concluded that DU had not impacted air quality at PTA or in the surrounding area.</p> <p>The best available scientific data for groundwater and surface water quality was incorporated into this EIS. Section 3.9.4.6 documents the existing management measures used by the Army to protect water resources. The State Department of Health (DOH) Safe Drinking Water Branch (SDWB) monitors groundwater quality of aquifers as described in Section 3.9. The DOH SDWB has released groundwater contamination maps for Hawai'i Island that show most contamination is along the eastern coast of the island. The DOH SDWB Environmental Health Portal is available at <a href="https://eha-cloud.doh.hawaii.gov/sdwb/#!/home">https://eha-cloud.doh.hawaii.gov/sdwb/#!/home</a>.</p> <p>Sections 3.5.4.11 and 3.5.4.12 describe the lack of mobilization of munitions constituents, including white phosphorus, within soil, groundwater, and surface water. Section 3.5.4.11 indicates that white phosphorus is a munitions constituent commonly released from many obscurants. Text notes that risk of contaminants mobilizing is not a concern as limited surface water and</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>long-term, minor, adverse impacts on the environment from pollutant migration due to erosion and runoff from training would have a less than significant impact as stormwater runoff is infrequent and tends to rapidly infiltrate into crevices of the highly permeable lava flows.” The Army is collecting sediment samples from a place that has no surface water link to the radiation-controlled areas. If any DU is present at the sampling site, it would have to be carried most likely by airborne transport. Even a simple topographic check would reveal that the sample site is more than 5 miles from the radiation-controlled areas where DU spotter rounds had been found, and there are lava flows effectively blocking any direct pathway for water to carry sediment between the contaminated site and the sample collection site. Further, the analytical method used is the one with minimal sensitivity the Army prefers and the criteria to discern the presence of DU is the activity ratio for Uranium-238 to Uranium-234 set at a high bar of three. The section states that “The sediment samples are collected at an area along the boundary of TAs 20 and 22. All sediment samples have exhibited uranium-238/uranium-234 activity ratios of less than 3.0 (IMCOM, 2018).” But the report referenced reveals that some of the samples collected have an activity ratio greater than one, discounting estimated error, which would indicate the presence of DU. For samples at PTA, the sample report indicates the sample results were qualified as estimated, meaning not even actual data. Even the site selected is not without problems. A sample was collected at a location other than the originally identified sample site. Section T.4.16 of reference (14), Pohakuloa Training Area Hawaii, notes that for sample collection at PTA, problems existed such as: “A sediment sample was collected from one location. The streambed was dry and a surface water sample could not be obtained. The laboratory noted that homogenization of sediment samples was hampered by the sample matrix, which contained varying sizes of rocks.” Although recommendations were made to the Nuclear Regulatory Commission on methodology to determine connectivity</p>	<p>groundwater pathways on the State-owned land pose minor potential impact to soil and groundwater quality.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>from the RCAs at PTA to the sample site, they were never acted upon by the Army. The sediment sampling site at PTA is deficient to provide the information it is intended to collect.</p>	
Michael Reimer		<p>It should be noted that groundwater samples are not collected at PTA. This is an unfortunate oversight as they should be. In the 1960s, wells were drilled to see if a potable water source could be located to supply the water needs of PTA. The wells were not drilled deeply enough to find a saturated zone. This led the Army to make a claim that if DU did percolate to the groundwater, it would take 12,500 years to do so (Section 7 of the December 18, 2011, letter from the Nuclear Regulatory Commission to the U.S. Army Radiation Safety Staff Officer). About a decade ago, additional wells were drilled, and shallow groundwater reservoirs were found a few years ago. These could be contaminated by the many toxic materials used at PTA. These shallower reservoirs should be monitored. For any monitoring of toxins at PTA, the Nuclear Regulatory Commission notes in section 8 of that 2011 letter, “As discussed above, the objective of the ERMP is to determine if DU is migrating from the SB range. Thus, the reliance on exceeding effluent limits or screening values is not appropriate for justifying the exclusion of an environmental pathway.” This is a sage comment that should apply to all monitoring programs at PTA.</p>	<p>The best available scientific data for groundwater and surface water quality was incorporated into this EIS. Section 3.9.4.6 documents the existing management measures used by the Army to protect water resources. The State Department of Health (DOH) Safe Drinking Water Branch (SDWB) monitors groundwater quality of aquifers as described in Section 3.9. The DOH SDWB has released groundwater contamination maps for Hawai‘i Island that show most contamination is along the eastern coast of the island. The DOH SDWB Environmental Health Portal is available at <a href="https://eha-cloud.doh.hawaii.gov/sdwb/#!/home">https://eha-cloud.doh.hawaii.gov/sdwb/#!/home</a>. Section 3.5 Hazardous Substances and Hazardous Wastes presents the existing conditions from current activities at PTA and notes that risk of contaminants mobilizing is not a concern as limited surface water and groundwater pathways on State-owned land pose minor potential impact to soil and groundwater quality.</p>
Michael Reimer		<p><b>SUMMARY:</b></p> <p>Overall, this document, ARMY TRAINING LAND RETENTION AT POHAKULOA TRAINING AREA SECOND DRAFT ENVIRONMENTAL IMPACT STATEMENT VOLUME I: EIS DOCUMENT POHAKULOA TRAINING AREA, ISLAND OF HAWAI‘I, HAWAI‘I, March 2024, is stunningly deficient. It was prepared without proper evaluation of all alternatives and lacks complete candor in its statements supporting the action the Army wants to enact. As such, numerous misleading comments and evaluations lead to incorrect assignment of resource impacts for various action alternatives, including the no-action alternative.</p>	<p>Section 3.5 Hazardous Substances and Hazardous Wastes presents the existing conditions from current activities at PTA and notes that risk of contaminants mobilizing is not a concern as limited surface water and groundwater pathways on State-owned land pose minor potential impact to soil and groundwater quality.</p>

**Responses to Second Draft EIS Comments**

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		<p>The credibility of this second draft EIS is severely compromised, and the conclusions supporting continuation of the lease must be rejected as they are forced in too many cases. Fortright evaluation would suggest that the most effective and acceptable alternative is the no-action alternative. Despite the economic and social doom and gloom and threat to national security presented by this draft EIS, those will not occur as there are alternatives available to the Army to continue its presence at the training area that would be superiorly beneficial to the military, the State, the County, and the public.</p> <p>Although this second draft could be rewritten or a third draft prepared to eliminate its numerous inconsistencies, disinformation, and contradictions, the only appropriate conclusion would still be as stated above: that the no-action alternative is the outstanding and proper choice.</p>	
Michael Reimer		<p>From ES.10, Adverse Impacts for the No Action Alternative: ES.10 concludes Socioeconomic Resources do not have a significant adverse impact for all categories; and Utilities are not considered because the impact would go beyond state-owned lands. (“Cumulative impacts for all resource areas, except for land use, biological resources, historic and cultural resources and cultural practices, and environmental justice, were found to be less than significant.”) That conclusion shows that the representation of significant adverse impact in Table ES-3 for the Socioeconomic Resources and Utilities no-action alternative is in error. Socioeconomic Resources and Utilities have previously been declared as having less than significant impact for all action alternatives. That leaves only Biological Resources as having a claimed significant adverse impact for the no-action alternative. ES-10 also singles out the adverse biological impact would be: “Biological resources would have significant, adverse, cumulative impacts on the Hawaiian hoary bat and protected and native species.”</p>	<p>Table ES-3 correctly indicates that the No Action Alternative would result in significant, adverse impacts for Biological Resources, Socioeconomics, and Utilities (refer to Sections 3.3.6.4, 3.10.6.4, and 3.15.6.4). These impacts are from actions associated with the end of the lease due to not retaining any of the State-owned land (e.g., ending ongoing activities, conducting lease compliance actions, conducting cleanup and restoration activities, resumption of State control and management). Hence, the No Action Alternative would result in greater impacts for some resources than the Proposed Action. In this EIS, the No Action Alternative is not a status quo (do nothing) alternative because it includes Army and State actions and responsibilities associated with the end of the lease. These actions would result in impacts different from a traditional No Action Alternative (e.g., no new action). Consequently, the No Action Alternative impacts cannot be added to (for purposes of environmental trend analysis) the cumulative impacts of the Proposed Action with past, present, and reasonably foreseeable future actions. Section ES.10 revised to clarify that the cumulative impacts analysis is the combined impacts of</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
			<p>the Proposed Action and lease compliance actions with past, present, and reasonably foreseeable future actions. Section 4.2 explains the methodology for the cumulative impacts analysis, which is the combination of the Proposed Action and lease compliance actions with past, present, and reasonably foreseeable future actions.</p>
Michael Reimer		<p>Revealing such an intention in the draft EIS merely presaged its potential resolve in any cooperative aspects with civilian government and needs. If given full control (through land exchange) of the leased land, it cannot be unexpected that at some time the U.S. Army would withhold all cooperative services with the County in that vicinity, including not allowing use of the Daniel K. Inouye Highway. Volume III Appendix H makes it clear that the State would not have rights to roads and trails if fee simple title is granted (“The State would lose its right to use roads and trails in the State-owned land retained”). Should this concern be any less a consideration than the Army making an equivalent claim about not having connector access to its government-owned land of training areas if the no-action alternative is implemented? Rights of way can be granted.</p> <p>There must also be a forward-looking need for the County to retain control of the right of way for this connector. Within the next few generations, there will likely be the requirement for a rail line between the windward and leeward sides of the island, and the Saddle Road will be the preferred setting for that line. Therefore, the County and State must retain absolute control of the leased land.</p>	<p>Text added to Section 2.1.1 to clarify that the Army would allow the roadway easement for the Daniel K. Inouye Highway to remain regardless of the land retention estate selected for implementation.</p> <p>Appendix H revised to match revised text in Chapter 2.</p> <p>Text in Table H-1 revised to clarify that under fee simple title the State would lose its right to use U.S. Government-owned roads and trails in the State-owned land retained. The Army would allow the roadway easement for the Daniel K. Inouye Highway to remain in place.</p>
Bryan Revell		<p>Since the illegal annexation and hostile take over of the Hawaiian kingdom we the kanaka have been oppressed by a hostile occupational force and have watched our land and sacred places being desecrated and our water poisoned. They just keep expanding and even digging below which was never discussed! Broken promises and lies are all we've known. No pta renewal or military expansion! In fact there should be restitution for all that has been done already.</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

<b>Committer</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
JJ Reyes		STOP THE BOMBING!!! STOP THE BOMBING!!! STOP THE BOMBING!!! PROTECT POHAKULOA STOP THE BOMBING!!! STOP THE BOMBING!!! STOP THE BOMBING!!!	Please see General Response 1.
juliana rhee		The US military has a long history of stealing the land and desecrating it, both ecologically and culturally. In the wake of the Red Hill Fuel crisis, citizens of Hawai'i and the world have seen the lack of accountability and proactivity the military handles ecological crises with. Why is this land necessary? Why are these tests necessary?	Section 1.2 provides information on the strategic importance of Hawai'i for national defense and PTA's role. Section 1.3 describes the purpose and need of the Proposed Action (retention of State-owned land at PTA).
juliana rhee		What will the US military do to include Hawaiian voices and minimize devastation to these sacred lands? when will enough be enough.	Please see Sections 3.3, 3.4, 3.6, 3.9, 3.10, and 3.11 of the EIS for information on biological resources, cultural resources, air quality, water resources, socioeconomic impacts, and environmental justice (including Army engagement activities).
Richard		I am a member of the Kahoahoa group. We have been engaging with the senior commander at Pohakuloa pre COVID. I have been very impressed with the Militaries willingness to participate in meaningful dialogue. We strongly support the retention of the Pōhakuloa Training Area (PTA). This facility is crucial for our national security and regional stability, enabling joint military training with our Indo-Pacific allies. The PTA helps counter the encroachment and harmful practices of the People's Republic of China, which threaten our ocean's ecosystem and Hawai'i's fishing industry. Maintaining PTA ensures we can continue protecting our environment and supporting our local economy. Thank you for considering my support. Sincerely, Richard	Please see General Response 1.
Juaquin Robinett		My name is Juaquin Wesley Robinett. I am -- I'm a full-time college student here at UH Hilo. And I've been here -- ever since I've been here for the past coming up on four years, I've learned a lot about Hawaii in particular and how it relates to me as a young black man and how the military, you guys -- since I come from a military family, you guys have always projected the image, all over the world, as the beacons of freedom, the beacons of democracy and so on	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>and so forth. But being here, I've learned that that's not the case because, I mean, just because it's yellow doesn't mean it's gold. And -- and also I -- I personally believe, along with everyone else here, that you should return PTA back to the Hawaiian government, not just here, but also in other parts in Hawaii, including outside the continental US like in Okinawa, Guam, even in Niger and other places too. And like a lot of the -- like a few of the people that stated before me that you claim to be stewards of the land, you've -- I've been through Pohakuloa lots of times and it looks barren. And I -- coming -- and also coming from a military family, you -- I respect you guys, but I don't have a lot of respect, but I -- but point is, dude, you should return the land because not only you're causing an environmental destruction here, but you're also creating lots of animosity amongst the native -- the Native Hawaiians, Kānaka Maoli, and even outside Hawaii too, like in Okinawa, Guam, and American Samoa. You -- you claim to be the beacons of freedom, but you are just -- you're just a representation. No offense, you're just a representation of pretentiousness and broken promises and broken treaties. Case in point, like, during the early years of the -- the United States, you've made several, if not hundreds, of treaties with the Native Americans. And almost all of them, I wouldn't say almost all of, all of them have been broken all in the name of security. But in reality, you just want more land just so you be like Britain, France, and other empires in the world, predominantly European. Bottom line is if you want to -- if you want to be the beacon of peace and freedom that you claim to be then start living up to it by returning the land and stop using my tax dollars and everyone's tax dollars to fund your charade for military supremacy. Thank you.</p>	
<p>Juaquin W. Robinett</p>		<p>As a out of state college student, since I've been in Hawaii, for a few years. I have learned so much about this pristine land - along with other things as well. But one of the that has been on my mind is the fact that the US claims to annex foreign land in the name/mantra of "freedom/security/peace" but at the same time the US contradicts its supposed creed. Since I am an avid scholar -</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>and someone who comes from a military family, I believe the US government/military should return the Pohakuloa Training Area - along with many areas outside of the continental US to the people of the lands you have annexed. The presence of the US military in places like Hawaii, Okinawa, Cuba, and many more has indeed made the US hated and viewed with disdain, the US Gov/Mil is not indeed the "Beacon of Freedom/Peace" the US Gov/Mil is the epitome of pretentiousness the gilded "apple" of the world. Also, the US continues to create proposals that may seem reasonable, but in reality it has serious repercussions for the native inhabitants of the Hawaiian Islands. In case you haven't known this... the myths of the US military being "good neighbors/guardians of the freedom and peace" is false. The pretense of the US military in Hawaii and elsewhere outside of the US is always followed by the destruction of the environment, and other things that negatively impact the inhabitants. Bottom line, the US military should return PTA back to the Hawaiian Kingdom - along with other parts of the Kingdom. The Gov. (US) should grant the state its original sovereignty (bef 1890s).</p>	
Rob Robinson		<p>Individual</p> <p>I am a veteran of the U.S. Army with 21 years of active service, as well as 20 additional years as an Army civilian employee. I enjoyed my years of government service and am proud to be a "Soldier For Life". That being said, I am against the renewal of all Army land leases in Hawaii that are expiring in 2029.</p> <p>I am totally aware that the sole mission of the Army is to defend our country whether at home or abroad. To accomplish this requires a reasonable amount of land for training. I am also aware that Environmental Impact Statements and land reclamation from the military footprint are secondary requirements, often to the detriment of the land. As for the State of Hawaii, the land is both limited and fragile.</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

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		<p>Unfortunately, the Army and it's sister services, have a poor record regarding care of the land that has been provided and entrusted to them. The examples of Kaho'olawe, Makua, Red Hill and Haleakala are cautionary examples. Reclamation of property previously used for live firing has been slow and painful to watch.</p> <p>As such, I restate my support for the return of the 23,000 acres of Hawaii Island land, as well as other land currently leased to the Army and soon to be under renegotiation with the State of Hawaii.</p>	
Rob Robinson		<p>A primary case is that of the 23,000 acres on Pohakuloa, initially set aside for the Hawaiian Home Lands to provide housing for Native Hawaiians. The property has no doubt been ravaged by the effects of military training conducted by the U.S., as well as foreign forces.</p>	Please see General Response 1.
Awapuhi S. Kalauli Robinson		<p>To be a Native Hawaiian is just something that sits on my birth certificate. The only true unalienable right that I have as a Native Hawaiian is the fact that my mookuahau continues from my kupuna. We march, we speak, we ask questions, we struggle, we produce facts, we show our trauma and what reparations return back to us, the natives of this pae Aina ? Pohakuloa, Kapukahi, Puuloa, Makua, the list is endless. It is clear that the motive for all these land restrictions is due to money, power and status. The United States has already provided several documents that state they owe reparations to the Native Hawaiians. The report I will reference here is known as the Mauka to Makai report.  <a href="https://www.doi.gov/media/document/mauka-makai-report-2-pdf#:~:text=iFROM%20MAUKA%20TO%20MAKAI,Public%20Law%20103%2D150%2C%20the">https://www.doi.gov/media/document/mauka-makai-report-2-pdf#:~:text=iFROM%20MAUKA%20TO%20MAKAI,Public%20Law%20103%2D150%2C%20the</a> A direct quote from the report is below: In 1993, with Public Law 103-150, the Apology Resolution, the United States apologized to the Native Hawaiian people for the overthrow of the Kingdom of Hawaii in 1893 and expressed its commitment to acknowledge the ramifications of the overthrow in order</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>to provide a proper foundation for reconciliation between the United States and the Native Hawaiian people. The passage of the Apology Resolution was the first step in this reconciliation process. In March of 1999, Senator Daniel K. Akaka asked Secretary of the Interior Bruce Babbitt and Attorney General Janet Reno to designate officials to represent their respective Departments in efforts of reconciliation between the Federal Government and Native Hawaiians. Secretary Babbitt designated John Berry, Assistant Secretary, Policy Management and Budget, for the Department of the Interior (Interior), and Attorney General Reno designated Mark Van Norman, Director, Office of Tribal Justice, for the Department of Justice (Justice)(together, the Departments), to commence the reconciliation process. Messrs. Berry and Van Norman, the authors of this Report, have accepted Senator Akaka’s definition of “reconciliation” as a “means for healing,” and in addition believe, in words taken from one statement, “a ‘reconciliation’ requires something more than being nice or showing respect. It requires action to rectify the injustices and compensation for the harm.”</p> <p>The authors urge the Federal Government to use the reconciliation process to address a wide array of issues, focusing on actions that will provide a better future for Native Hawaiians. Part of my problem, when it comes to providing testimony, is the existence of reports such as this and how they hold no value with the federal government. The definition of a hostile environment is brewed with the continued health of our ancestral land rights remaining out of reach to the natives of this aina. We have heard the studies of what illegal activities occur in military occupied lands. The bombings, removal of iwi, the destruction of sacred sites, limitations of kanaka allowed access to these lands. The most painful is the emotional abuse and trauma our people face; that the Native Hawaiian people face daily due to such actions. I will address the entire land surplus lease as a whole and this includes Pohakuloa. The impact the United States</p>	

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>continues to lay on the Native Hawaiian community directly affects our access to housing, economic opportunities, elevation of our la hui to exist on our own aina. This is from taking our wai, water, from us and making us financially burdened in order to drink our own resources. Utilizing banks that regulate all entities operating in Hawaii in some facet. I am referencing First Hawaiian Bank, Bank of Hawaii, and the Bishop Trusts that were created by Charles Reed Bishop which intertwines heavily into the state and federal entities. When you research the connections between these banks, the State, the federal government it starts to shock even the average person. Here is my first shock, if the Bishop estate trust of Bernice Pauahi Bishop was signed October 31, 1884, but she died October 16, 1884 how can this be possible. More importantly, she died during the existence of the Kingdom of Hawaii, which means the Kingdom wouldn't have approved the trust. The fact that the entity isn't audited or reviewed shows recognition that all entities are connected. The two banks are here as an example because of the significance of their existence in 1895 after the overthrow of the Kingdom of Hawaii. These banks are involved in many financial processes in Hawaii. The biggest asset they capitalize on is selling, renting, leasing and profiting from our lands. How can lands that are not being utilized by the United States be outsourced to private equity firms for profit and not provided as housing to the Natives of the land that it is occupying? This is in reference to the consistent involvement of Blackstone and Blackrock in our lands. If contract law is the oldest law, who do these lands belong to and why are their descendants not being provided notice or reparations for lands that were taken illegally? Why do you the United States allow quiet title claims when you have our mookuauhau and birth certificates in your possession? Why is the importance of notifying the rightful landowners not a priority? Why are the crown lands of the Native Hawaiians being utilized without the permission of the Native families that would be descendants and heirs to such lands? Let's continue this argument when it comes to wai, water. The</p>	

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>mismanagement of water resources by the military has been broadcasted and no reparations. Why I say no reparations is because, will the military ever truly fix the problem and remove each fuel tank at red hill? Possibly but will they replace all the plumbing connected to it? No. They will take the easy and cost efficient way out and leave the existing lines pretending to fix the problem. Schofield Aquifer, damaged. Water locks all across Oahu, Maui, Kauai, Molokai, Hawaii. Lanai is privately owned by a foreigner. Lunalilo trusts lands being sold to more foreigners; one is an ex-president Obama. You want to know why 52% of Native Hawaiians live in the United States and not Hawaii, because of the consistent push to increase the cost of living that is no longer affordable to the Native community. It has been documented that the disparity of rental pricing on blackstone properties such as Kapilina Beach homes creates a rental disparity that is completely visible by the tenants. You have some homes being rented to non natives at significantly lower costs then those who are native. When these topics are brought up, they are ignored and there is no process that allows the voice of the community to be heard in the federal, state or private spaces. The priority is profit over people. The purpose of shedding light on this topic is to show it's all connected. Every resource that should be available to Kanaka Maoli is limited by actions set forth by the collaboration of these entities. It is the consistent example of emotional abuse and trauma that is placed on Native Hawaiians of this land even though the existence of Native Hawaiians is documented and the reports are created by the federal government that reparations are owed to the Native Hawaiian people. I ask this to the federal government, what purpose is a testimony when you already recognized on October 23, 2000, that the reparations to the Native Hawaiian community is the first step for the healing process. When will you decide that it is important enough to enforce the report and make a difference for the Native Hawaiians. This report came out 24 years ago. Hawaiians have been overthrown for 131</p>	

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>years. You, the United States, are only 250 years old and struggle to provide sustainability for your country. You know why there's a University of Hawaii Native Hawaiian program? It is to indoctrinate our language in order to interpret our history and documents for the purpose to control what the United States, the State of Hawaii and the education system shares with the Native Community. Why isn't there a government entity providing services to Hawaiians to help put together their mookuauhau in order to get Hawaiian homelands? Doesn't the State of Hawaii have everyones birth certificates? Why do I have to pay in order to get these documents? The limitations that have been created to stop the Native Hawaiian community from rising is evident with how limited the processes are to ease our existence and provide the Native Community with feasible opportunities to reclaim their lands. The United States has more than enough resources to conduct the same training, the same research, the same structures in a multitude of places. The occupation of Hawaiian lands needs to be made a priority and focus to not only be returned to the Native Hawaiians but also they must receive market price compensation for these lands that have been utilized illegally. This testimony is to provide talking points that should be addressed when land comes up. The permission should be granted by the original and alodio title holders as to what should happen to the land. The contract of those lands should be returned and all efforts should be made to ensure it happens. Continuing to discredit the existence of Native Hawaiian land owners is the exact opposite practice of what the United States preaches. The contract that should be honored is the Constitution of 1864 and with emphasis on the Land act of 1865 which designated all crown lands as inalienable. I find it very disturbing that the date choses as the date at which the Native Hawaiians had enough opportunity to reclaim their lands was August 21, 1964. Most would overlook the date. Did you know that our valid constitution of 1864 was signed on August 20, 1864. Exactly 100 years and 1 day that the United states decided it was their right to take what didn't belong to</p>	

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>them. I will not beg, I will not cry, I demand that you return the lands. We will continue to push for our existence in our lands. The lands should be returned. Amama ua noa! Awapuhi S. Kalauli Robinson -Founder, CEO</p>	
Andrea Rocha		<p>Good evening, I am Andrea Rocha. I work in Pepe'ekeo, live in Hawaii, from FI, Latina blood. my blood was spilt from similar battles of kings, villages, volcanoes, mountains, rivers &amp; wars. After it all, the world has the power of change. Progress. Our Keiki's happiness, which they see universally. A town with no legs that makes strides. Islands are like that. Volcanoes do not just destroy/create, they also transform. All life and rock needs space somewhere. Let us work together. Please.</p>	Please see General Response 1.
James Rodrigues		<p>1) THE ENTIRE EIS PROCESS HAS PROVIDED THE ILLUSION OF INCLUSIVENESS WHILE IT DENIED, DISMISSED AND DISTRACTED FROM A MAJOR ISSUE OF THE USA INVOLVEMENT IN THE ILLEGAL OVERTHROW OF HAWAIIAN KINGDOM AND CONTINUED BELLIGERENT OCCUPATION OF LANDS.2) USA MILITARY IS OCCUPYING FORCE AND OPERATING UNDER CONTINUED MARSHALL LAW. AS SUCH NEED TO BE ADMINISTERING THE RULES OF OCCUPATION AND ENFORCING KINGDOM LAWS.3) STATE AND MILITARY HAVE NO AUTHORITY TO NEGOTIATE OR OCCUPY, BUY, CONDEMN, LEASE IMPOSE USA PRESIDENTIAL ORDER OVER ANY HAWAIIAN LANDS.4) CURRENT 1959 LEASE CONTRACT NEVER COMPLETED AS NO MONEY RECEIVED OTHER THAN ACKNOWLEDGEMENT IN LEASE WITH NO PHYSICAL PROOF OF PAYMENT.OCCUPIED LEASED LANDS WERE INTENTIONALLY UNDER VALUED HAWAIIANS HAVE RECEIVED NO COMPENSATION FOR USE OF PILLAGED LANDS.DECADES OF UNPAID FAIR MARKET RENT PLUS INTEREST AND LOSS OF USE REMAIN A MAJOR ISSUE.5) LEASES AND NEGOTIATIONS INCLUDED AGREEMENT TO CLEAN UP MILITARY TOXIC UXO6) TO RESTORE LANDS TO PRE USE CONDITION AFTER EACH TRAINING.DECEPTIVE NEGOTIATION PRACTICES THROUGHOUT ALL LEASES ADVANTAGED ONLY USA MILITARY AND NOWHERE PRESENTED EQUITABLE FAIRNESS IN AGREEMENTS.7) ALL</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

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		<p>EIS DOCUMENTS DEMONSTRATE A NEED FOR PEER REVIEW TO ASSIST COMMUNITY MEMBERS TO UNDERSTAND CONTENT LANGUAGE, IMPACT, DEFINITION, EXPECTATIONS NOT OBVIOUS IN EIS DOC.8) IT APPEARS DLNR ACQUIESCE TO ALL MILITARY DEMANDS WITH LITTLE OR NO BENEFIT TO HAWAIIANS OR PEOPLE OF HAWAII. HAWAII FORCED TO CARRY FULL WEIGHT OF USA NATIONAL SECURITY WITH LITTLE OR NO BENEFIT. INCREASED COST OF LIVING, FORCED HOMELESSNESS, DENIED ACCESS TO RESOURCES CULTURAL SITES.9) THE APPEARANCE THAT STATE, COUNTY, FEDERAL GOVERNMENT AGENCIES COLLUDING FOR UNSPECIFIED BENEFITS RECEIVED EXCHANGED PROMISED.10) ENDANGERED SPECIES CRITICAL HABITAT IMPACTS IGNORED OR DISMISSED BY RESPONSIBLE AGENCIES THAT FAILED AND CONTINUE FAILED PROTECTION OBLIGATIONS. OF THE 90,000 NESTING U'AU ENDANGERED PETRAL NON APPEAR TO EXIST IN POHAKULOA TODAY.11) FEDERAL FISH AND WILDLIFE, PARK SERVICES, NATIONAL LANDMARKS EPA,OVERLAP OF POHAKULOA TRAINING AREA AND MAUNAKEA NATURAL LANDMARK OFFENSIVE CONFLICT TO HAWAIIAN CULTURE AND PRACTICES.12) MILITARY ENCROACHING ON CULTURAL SITES, PRACTICES, PEACE NOT CONSIDERED IN ANY MEASURE OF SIGNIFICANTS. BOMBED, SHOT UP, BULLDOZED, POISONED WITHOUT CONCERN.13) LIVE FIRE, EOD DISPOSAL AND OBOD TOXIC EXPOSURES TO AIR, LAND WATER IMPACT ON HUMAN AND ALL ENVIRONMENTAL RECEPTORS NOT MONITORED OR ASSESSED.14) NEED FOR FULL TOXIC SCREENING FOR EVERY MILITARY TOXIC FROM ALL MILITARY ACTIVITIES AS TRAINING EXPOSURE TO PUBLIC AND ENVIRONMENT.FULL AND CONSTANT AIR QUALITY MONITORING ADN WARNING SYSTEMS NEED TO BE IN-PLACE TO PROTECT ALL DOWN WIND COMMUNITIES INCLUDING WATER MONITORING DOWNSTREAM AND AREA15) HISTORIC CULTURAL PROPERTIES, SITES, NEED TO APPLY DOLLAR VALUES, DAMAGE ASSESSMENT, RESTORATION COST EVALUATION INCLUDED FOR COST AWARDS TO HAWAIIANS.16) FAILURE OF STATE, FEDERAL AGENCIES TO</p>	

**Responses to Second Draft EIS Comments**

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		<p>PROTECT HAWAIIANS RIGHTS TO ACCESS RESOURCES, WATER, TRAVEL, HOUSING, EMPLOYMENT, QUALITY OF LIFE, ECONOMIC STABILITY, WITHIN ALL OF POHAKULOA LANDS REGARDLESS OF CONTROLS.17) MANY RESOURCES TRANSFERED TO VARIOUS STATE, COUNTY FEDERAL AGENCIES PREVENTING HAWAIIAN ACCESS, USE, BENEFIT REMAIN UNREALIZED.18) SEGMENTED EIS PROCESS BURYING PUBLIC IN PAPER WITHOUT ASSISTANCE OF PEER REVIEW CONSULTATION OR LEGAL ADVICE FOR BALANCED NEGOTIATION. AS WITH AGENCY BEING FUNDED WITH TAXPAYER MONEYS, PUBLIC SHOULD HAVE THE SAME ACCESS TO FUNDS TO HIRE EXPERTS FOR FULL PEER REVIEW. 19) THE ONLY ALTERNATIVE FOR CONSIDERATION IS THE FULL HAWAIIAN LANDS RETURN, FIRST FULL RESTORATION, CLEANED TO FOOD USE STANDARDS, AND/OR FUNDING FOR FUTURE CLEAN UP BY HAWAIIANS.20) STATE FAIL TO DO REGULAR INSPECTION OF ALL LANDS USED BY MILITARY AND IMPACTS ON LAND. TRUSTING MILITARY HONEST AND TRUTHFUL CARE AND MAINTENANCE HAS LEFT PUBLIC DISTRUSTING STATE, EPA, EIS, FISH AND WILDLIFE, CLEAN WATER AIR AGENCIES AS COLLUDING FOR THEIR OWN INTEREST.21) INADEQUATE ACCOUNTING OF ENDANGERED SPECIES, CRITICAL HABITAT, CULTURAL SITES, LAVA TUBES, CULTURAL RELICS, FUNERARY OBJECTS, BURIAL PROTECTION, 22) WE WANT FUNDING PROVIDED FOR COMMUNITY TO HIRE, PROFESSIONAL PEER REVIEW OF ENTIRE EIS TO INSURE HONEST, FAIR EFFORTS, TRUE PROCESS AND CONCLUSION.23) HAWAIIAN PEOPLE WANT FULL ACCESS TO ALL COPIES AND EVALUATION OF LIDAR SCANS FOR POHAKULOA NEED CULTURAL; AND ENVIRONMENTAL REVIEWS AND ASSESSMENT TO COMPARE WITH MILITARY ARCH EVALUATION. PROVIDE ALL INFORMATION FOR PEER REVIEW TO PRESENT TO FEDERAL COURTS.24) A FULL REVIEW OF ALL USA MILITARY, STATE, COUNTY AND AGENCIES, OF INTERNATIONAL LAW OFFENSES, PILLAGING, WAR CRIMES, DESECRATION OF HAWAIIAN CULTURAL SITES, RELIGIOUS EXCLUSION, OVERNIGHT ACCESS FOR EVERY CELESTRIAL EVENT OCCURRENCE, OPPORTUNITY WITHIN</p>	

**Responses to Second Draft EIS Comments**

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		<p>ALL OF POHAKULOA LANDS FROM TIME OF CAPT COOKE ARRIVAL TO CURRENT.25) PERPETUATION OF WAR IS A KILLING DARK ENERGETIC LEAVES DARKNESS AND PROMOTES VIOLENCE WITHIN OUR COMMUNITY AND PACIFIC. 26) LACK OF PEACE ENERGY EFFORTS LEAVES ALL HAWAIIANS AND LANDS INJURED, ALL NEEDING HEALING.EIS PROJECT BACKGROUND QUESTIONS AUTHORITYNO mention of undivided interest for every Hawaiian.NO mention of NO TREATY OF ANNEXATIONNO mention of MARTIAL LAW OccupationNO mention of Manipulated annexation, statehood vote, military occupation and voted.2) NO PROOF OF LAND TITLESNO mention of military rules of OCCUPATION to follow laws of Hawaii KingdomNO mention of AMERICANS AND USA military complicit in illegal Hawaiian kingdom overthrowHOW DOES STATE USA AND DLNR RECONCILE THESE CONCERNS in this EIS?3) PURPOSE AND NEED CONSERVATION LAND DESIGNATION NOW STOP ALLOWED TO BE BOMBED, POISONED, DESTROYED, PILLAGE AND DAMAGED RESOURCES...4) LEASE AGREEMENT, TIME 65 YRSTD, CONDITION OF RETURN CLEANED TO PRE-USE CONDITION, VALUE \$1.00. PLEASE PROVIDE ORIGINAL RECEIPT FROM USA TO HAWAII, MARKED PAID OF \$1.00.5) ENVIRONMENTAL PROTECTION FOR AIR, WATER, SOIL, AND ALL ENDANGERED SPECIES AND CRITICAL HABITAT PROTECTION6) HAWAIIAN HISTORIC CULTURAL TREASURES MUST BE IDENTIFIED, DOLLAR VALUE APPLIED, LIDAR DATA REVIEWSITES PROTECTED FROM HARMVALUE APPLIED TO DESTROYED, DAMAGED,TO DATE: STATE AND ARMY, INADEQUATE INSPECTION, MONITORING AFTER EACH TRAINING SENARIO TO INSURE NO DAMAGE AND PREVENTION, PRESERVATION AND PROTECTION OF SITES. COMPENSATION TO PEOPLE OF HAWAII.7) EVALUATION OF NOISE, CONCUSSION, VIBRATION DISTURBANCES OF TRAINING TO ENDANGERED SPECIES, HUMAN QUALITY OF LIFE, HEALTH MONITORING OF ALL POSSIBLE COMBINED CUMULATIVE IMPACTS TO MENTAL HEALTH, SPIRITUAL HEALTH, EMOTIONAL HEALTH AND WELLBEING. COMPENSATION FOR LOST PEACE OF MIND, LOST SLEEP,</p>	

**Responses to Second Draft EIS Comments**

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		<p>PTSD, QUALITY OF LIFE INTERRUPTION.8) CONSTANT AND REGULAR CLEAN AIR MONITORING, TOXIC CHEMICAL AND RADIATION MONITORING TESTING BY INDEPENDENT LABS AND PEER REVIEWED.9) STATE FIDUCIARY DUTIES TO PROTECT ALL HAWAIIAN LANDS AND RESOURCES FOR FUTURE GENERATIONS APPEARS TO BE INADEQUATE AT BEST.10) RETURN ALL STATE PUBLIC USED LAND FOR FULL PUBLIC ACCESS11) RETURN ALL LANDS TAKEN DURING OVERTHROW, MARTIAL LAW, PRESIDENTIAL ORDERS, CLEANED TO FOOD LEVEL SAFE OF ALL MILITARY TOXIC UXO AND HARMFUL ELEMENTS TO BE MONITORED SUPERVISED BY HAWAIIAN PEER REVIEW, OVERSIGHT AND FINAL APPROVAL12) SUFFICIENT FUNDING TO INSURE COMPLETE CLEAN UP RESTORATION OF ALL RESOURCES AND ENVIRONMENT TO HAWAIIAN STANDARD AND PEER REVIEW APPROVED LEVELS UNTIL 7 GENERATIONS OR PERPETUITY WHICH EVER IS REQUIRED FOR FULL COMPLETION.13) ADDRESS ALL SOCIAL-ECONOMICS AND ENVIRONMENTAL INJUSTICE BY ALL MILITARY PRESENCE, LAND USE, RESOURCES NEEDED, IMPACTING HAWAIIANS HEALTH, PEACE OF MIND, SUSTAINABILITY STATE OF PEACE.14) QUALITY OF LIFE SUFFERS, MENTAL HEALTH PTSD SUFFER, COST OF LIVING, POVERTY, HOMELESS HAWAIIANS, COMPENSATION TO EVERY HAWAIIAN AND LOCAL FAMILY FROM OVERTHROW OF HAWAII FOR 7 GENERATIONS OR PERPETUITY WHICHEVER IS REQUIRED FOR FULL RESTORATION.15) ALL STUDIES, MONITORING, TESTING MUST BE DONE BY INDEPENDENT ORGANIZATION WITH PEER REVIEWS SUPERVISED BY FEDERAL COURTS. MAHALO,JAMES "SPARKY" RODRIGUES</p>	
Tara Rojas		<p>Aloha, this is Tara T-A-R-A. Rojas, R-O-J-A-S, speaking on behalf of myself as an individual. I am against the renewal of the lease, Pōhakuloa Training Area, by the army needs to be discontinued and stop now, and in these 5 years left of the lease up in 2029, you should focus on cleaning up the area and leaving in 2029. This is ridiculous, that as I'm listening to live, testimony happening right now, May 7th, I'm watching the livestream, continuous trauma takes no excuse and does not take precedence over the wellbeing, the maoli ola, of the people of Hawai'i, especially and</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

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		<p>particularly kanaka maoli. The facts are that you are using sacred land, important land, right between the two mountains, Mauna Kea Mauna Loa, contaminating the land with depleted uranium, white phosphorus, and the bombings. For what purpose? To train to kill using our monies, using our land to do that. To destruct and destroy outside of Hawai'i and within Hawai'i itself. It has been enough years, over 131 years of desecration, destruction, and contamination of our lands, our waters, taking away land from kanaka maoli and the people of Hawai'i. Again, you need to clean up. You need to leave, and I was in that meeting, the BLNR, right behind, and asking the Army leader what is he feeling as he's listening to this. And very happily, he say oh, you know, I've been here, you know, stationed 3 times before, so I understand. But at the same moment you're talking about using the land for training, that is not understanding. And once you found out, you know, that I was so like recording quickly change, demeanor, and stop speaking. This is life and livelihood. So again. No is no. Option 3. No lease renewal. Clean up and leave. Mahalo.</p>	
Heidi Rusina		<p>Dear Matthew Foster, To whom it may concern: I am opposed to the Army's retention of any of the "State" lands at Pōhakuloa. I support the "No Action Alternative" that would allow the lease to expire and require the Army to comply with all lease terms that include the clean-up of these lands. The other alternatives preserve a status quo in which Hawaiian land is bombed, burned, littered and polluted. The status quo is precisely what needs to be changed. Sincerely, Heidi Rusina</p>	Please see General Response 1.
Heidi Rusina		<p>Dear Jeff Overton, To whom it may concern: I am opposed to the Army's retention of any of the "State" lands at Pōhakuloa. I support the "No Action Alternative" that would allow the lease to expire and require the Army to comply with all lease terms that include the clean-up of these lands. The other alternatives preserve a status quo in which Hawaiian land is bombed, burned, littered and polluted. The status quo is precisely what needs to be changed. Sincerely, Heidi Rusina</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

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Lynn Ryan		<p>Comments on Pohakuloa Training area 2029 lease extension 5/9/2024 Please deny extending the lease on Pohakuloa Training Area. The U.S. Army must clean up after themselves. That is just good manners and is a responsibility of being a good steward of leased land. Unexploded ordinances, chemical spills, anything not part of the land itself must be removed. Are there ongoing water sample tests? And does the U.S. Army agree with the results of those tests? The people in charge of Pohakuloa should produce evidence that they are involved in implementing decisions about the the Red Hill travesty. The key concept here is implementation of promises made. Because of the ongoing denial, pushback and plain lies from the Defense Department about the ongoing pollution and questionable water sample lab tests at Red Hill area, Pohakuloa tenancy under the current lease is getting a bad name. We the community cannot be expected to believe what we are being told by the U.S. Army leaseholders based on what we know about Red Hill. More action on promises of cleanup would go a long way to reassure our community on Moku 'o Keave. I appreciate the U.S. Army good neighbor contribution to emergency response and safety on the Saddle Road. Sincerely, Lynn Ryan Kailua Kona, HI 96740</p>	Please see General Response 1.
Emily Salmieri		Get off Hawaii land. Stop harming the environment and the people.	Please see General Response 1.
Dominic Sardinha		<p>23,000 Acres of land that was leased to the U.S. military for \$1.00. While kanaka having to move because the average cost of a home is over a million. This is Hewa!!! It also makes no sense to have to train here and hurt and litter our 'aina. Ex Kaho'olawe is now in habitable due to military training. When is enough, enough.</p>	Please see General Response 1.
Jared Saxbury		<p>With the recent uptick in Chinese incursions the last thing the United States, including Hawaii needs is a removal of the only South Pacific training area for the military. I think the loss of PTA would be a clear signal to the bad actors in the pacific that Hawaii is ripe for the taking. The media stated "U.S. officials said it ( Chinese spy balloon ) was equipped to detect and collect intelligence signals as part of a huge, military-linked aerial surveillance program that</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		targeted more than 40 countries. Beijing insisted the balloon was just an errant civilian airship used mainly for meteorological research that went off course due to winds and had only limited "self-steering" capabilities." If we continue to be blindsided by bad actors we will be completely blind in a matter of no time. PTA has been in Use since 1956, Military training in the area of PTA has been used since the training for Iwo Jima in WW2. This is not the time to drop the PTA facility. If ever.	
Laila Moire Selvage		Stop the desecration of sacred land. Growing up here on the bake island, I remember seeing bomb testing from the school bus on my field trip from Hilo to Kona. It's been almost 70 years of this. Enough is enough we must preserve our sacred land and malama aina!	Please see General Response 1.
Geoffrey Shaw		Hello, my name is Geoffrey Shaw, and that's Geoffrey with the G: G-E-O-F-F-R-E-Y. And I'm not affiliated with anybody. And I just want to express my concerns that the whole process is flawed. I mean, it's just so obvious that the saddle region of Hawai'i Island is not a proper place to do military training. It's full of cultural sites and significance and endangered species, and there's no amount of orange fencing that can be placed around the endangered species to keep from inflicting harm on them. And you know it's just an exercise in - it's a bully exercise. You know, because it's the military - that's their mindset. We're going to get our way. We have the big guns. And you know, trying to fight them is pretty futile unless you just have a change of attitude. So that's what I'm calling for is a change of attitude. It's the Environmental Impact Statement. The environment is being destroyed by the process, by what they do there. And there's just no ifs, ands or buts about it. I've talked to the military people up there, and they have no intention to ever clean up the impact zone. And they made that very clear, and they don't make that clear in any public forum. But behind closed doors, they'll say, sure we don't care, you know. And they have no intention of ever surveying that area either. And if you just remove that 50,000 acres from being significant, you know, I mean what is significant. So I guess that's my spiel. Maybe I'll try to make a more you	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>know – I got to read what they said and everything. But I know it's going to be BS, because I've just seen too much stuff coming out of the military, and I know it's all BS, and they're just trying to justify their actions. But there is no justification. You know, just the other – well, the thought occurred to me the expression, the leader of the free world. That's an oxymoron. The free world doesn't need a leader. It needs a facilitator. I mean, if we're free, we don't need to be led. So anyhow, that's my, that's my spiel. And I know you don't give a crap, and that's sad, and you don't care about the future, about the kids and everything else. Because if you did, you would not be continuing on the path that you're continuing on. So, anyhow. Have a good day. Thanks.</p>	
Ricia Shema		<p>Oh, my name is Ricia Shema. I currently live in Volcano for the last 30 years. Prior to that, I lived outside of Kapa'au, North Hawaii, and came here from the continent. There were so many things that I couldn't even start to figure out what to say, what to keep. So I'm just -- I just threw out the paper and I'm going to come here with my feelings and my heart. I'm going to talk about my experience -- my personal experiences. I graduated high school in 1967. A large percentage of my graduating class men, young men, were drafted into the army straight over to Vietnam, several of them within two weeks of graduation. That was not a good thing that happened. A lot of those people, a lot of my friends, my generation became a lost generation of military survivors. The army did not take care of my generation of soldiers. I -- I -- I also want to say that I have deep respect for the people who fight for my country. I have no problem. My problem is with the military industrial complex, which I first heard as a little kid. Anyway, homeless, drug addiction, mental health issues, Agent Orange later on, which the army refused, refused to verify or treat for the longest time. After that, there was other things that came up. But in the Iraq war, burn pits -- right now, my friends' adult children who fought in -- in the Iraq, in that really, really, really, really stupid illegal war are suffering extreme damage from burn pits. And only just now are they receiving any kind of treatment or</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>validity for their -- their problems. And it goes on and on. Most recent is the Red Hill. If anybody thinks that the military gives a rip about the people, just look what happened with the Red Hill disaster. How can we trust anything that comes out of the military complex? My whole life I've been seeing stuff that it's broken promises, coverups, lack of care for people who are in the military. The other thing that happens, people get programmed to go into the military, which is what needs to happen to be a good warrior, but they don't get deprogrammed when they come out to bring them back into societal norms and being able to get along better. It's a huge problem. And I guess my bottom line, because I could go on and on and I might be getting a little carried away here -- oh, also another thing in my experience, when I was six years old, I lived in Far West Texas. My big mama drove back and forth between California, where my Army Air Force uncle bought her a little bungalow. And she crossed over, during those nuclear tests, up range Nevada, and she died of what they finally determined was small cell carcinoma. I do believe that she died because of military testing. Okay. And I guess that's all I have for right now. I could go with a million reasons why this is a terrible idea, but my big thing is we cannot trust a thing that is happening with you folks. Mahalo.</p>	
Robbie Ann Shimose		<p>My name is Robbie Ann Shimose, and I am a middle school counselor, so I'm going to speak to you from that perspective. Every day in my school counseling office, or most every day, I have students who come in to talk about situations that are happening to them, you know, social situations. And one of the things that we talk about and we educate our students about is bullying and harassment. And simply bullying is when somebody repetitively does something to you that you don't want done to you. And no matter how many times you tell them to stop, they continue to do it. That's just a simple definition of bullying. And so if we look at that definition, and if we look what people here have said tonight and for decades, you're bullies and people don't like to play with bullies. And the recommendation that I give to my</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>students is you report bullies and you keep reporting it until you get some sort of -- you get help and the bullying stops. And so simply put, we don't want to play with you guys. You need to leave.</p>	
Lanny Sinkin		<p>My name is Lanny Sinkin. I rise in opposition to the idea of the army continuing to occupy Hawaii. I -- it's like the elephant in the room that got mentioned a couple of times, the -- the apology resolution was mentioned. I highly recommend that you encourage your folks in the army and other services to read the apology resolution. It's a very detailed and accurate description of the overthrow of a legitimate government that was -- had a peaceful relationship with the United States, and that was overthrown by raiders -- traitors within the government and by United States personnel who cooperated with them. You have to know that story to understand the story of Hawaii. So here we are talking about land that was still stolen, land that was stolen from the people of Hawaii, passed on to the so-called state of Hawaii, passed on from them now to Pohakuloa. And there's a -- basically underneath that, there's a -- there's a claim to land that's going on here. A transformation from what was seeded lands, as they call it, but -- but sacred lands for Hawaii. A transformation from that into a commodity. A land that you can just take over this piece from here and give it to that piece over there and we'll swap. You know, "You take A, I'll take B," as if there are no prior owners who indeed have a right to the land. And it's important to understand the difference between right holders and stakeholders. You know, the right holders are the people who were here originally; the stakeholders are people who came later and have claimed to be part of the -- the -- the community now. These are -- these are issues that are huge to deal with. The -- the apology resolution called for reconciliation. There's been no effort at reconciliation ever between the Hawaiian people and those who stole their country. So I rise in opposition to this effort to transform that relationship. Mahalo.</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
Lanny Sinkin	Temple of Lono	The Army looks at the threat to the military from climate change. Missing is the threat from the military increasing the accumulation of gases that cause climate change.	The EIS recognizes the potential effects of climate change. Section 3.6.6 provides an analysis of climate change impacts on the Proposed Action as well as the Proposed Action's potential contributions (i.e., GHG emissions) to ongoing climate change.
Lanny Sinkin	Temple of Lono	If a new lease is approved, the multiple agencies will continue to inflict the damages so readily apparent from the activities of the current lease holder. The impacts of the land swap proposed are, therefore far more than those that would result from a "simple real estate transaction." To the contrary, the impacts will be taking place over the entire time of the new lease.	Please see General Response 1.
Lanny Sinkin	Temple of Lono	The Army's false humility in denying its ability to produce a quantitative analysis because there are "no tools, methodologies, or data inputs reasonably available to support" such an analysis is ludicrous. No institution on the planet has more resources available than the United States military. Certainly there will be uncertainties. That does not foreclose performing the analysis using the best available "tools, methodologies, and data." For example, The Army has the data on how much fuel the military purchases and consumes that can easily be converted to the greenhouse gases produced. If such data is not readily available, that absence would be a measure of mismanagement that the military should correct, not serve as an excuse for being unable to calculate environmental impacts. The Army should not be allowed to escape its legal obligation to produce a quantitative analysis of the greenhouse gas emissions by claiming incapacity or incompetence. These claims are also self-serving. They serve to shield the military from regulatory scrutiny by making regulation impossible. The Army is not incapable or incompetent; the Army simply refuses to prepare the required analysis.	Section 3.6.2 explains why a quantitative, full life-cycle analysis of greenhouse gases has not been performed. Section 3.6.6 provides a qualitative analysis of the direct and indirect greenhouse gas emissions from the Proposed Action alternatives. HEPA does not require a quantitative analysis of greenhouse gas emissions. Text added to Section 5.2 (incomplete information/unresolved issues) to elaborate on the lack of available information to conduct a quantitative analysis of greenhouse gases and associated social costs as well as the reasons for proceeding without resolution.
Lanny Sinkin	Temple of Lono	The Army treats the application to retain lands for the Pōhakuloa Training Area as a "real estate transaction." The Army then uses that characterization of the transaction to assert that the lifecycle of GHG emissions cannot be calculated because "there are no tools, methodologies, or data inputs reasonably available to support such	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		calculations.” The Army uses the Army Climate Assessment Tool to identify potential climate change threats and rank the relative risk each threat presents to a given Army installation in 2050 and 2085.	
Lanny Sinkin	Temple of Lono	There are two contexts in which the proposed transaction is taking place. The first is the consideration that must be given potential impacts on sacred practices and beliefs of continuing the destructive activities of the various agencies that use the leased land. That consideration is well developed in the comments filed by spiritual practitioners. See Comments of E. Kalani-Flores, Representative of the Kalani-Case ‘Ohana. {The Temple of Lono incorporates those comments by reference into this filing?} The second is context is the expiration of the current lease. If a new lease is not approved, there will be no transaction and the Mauna will be left in peace to heal.	Please see General Response 1.
Lanny Sinkin	Temple of Lono	<a href="https://www.aljazeera.com/news/2023/12/12/elephant-in-the-room-the-us-militarys-devastating-carbon-footprint">https://www.aljazeera.com/news/2023/12/12/elephant-in-the-room-the-us-militarys-devastating-carbon-footprint</a> If a journalistic outlet can make the calculations, based on publicly available information, surely the Army, with far more resources and access to data, can also make the calculations.	Please see General Response 1.
Lanny Sinkin	Temple of Lono	To the extent the Army’s inability to calculate greenhouse gas emissions traces to a failure to keep accurate records, the cure is to correct the records, not fix the books. Until those corrections are made and that analysis is reviewed and accepted, the application should be denied.	Please see General Response 1.
Lanny Sinkin	Temple of Lono	There is an old saying that “where there is a will there is a way.” The opposite is also true: where that is no will, there is no way. There is no will on the part of the Army to produce a quantitative analysis, so there is no way the military will do so. Only if producing that analysis is a precondition for accepting the DEIS will the Army be compelled to do so. If the quantitative analysis is indeed impossible, then the Precautionary Principle should be applied. The Precautionary Principle implies that there is a social responsibility to protect the public from exposure to harm when scientific investigation has found plausible risk. These protections can be relaxed only if further scientific findings emerge that provide sound evidence	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		that no harm will result. <a href="https://files.nc.gov/ncdeq/GenX/SAB/Overview%20of%20the%20Precautionary%20Principle.pdf">https://files.nc.gov/ncdeq/GenX/SAB/Overview%20of%20the%20Precautionary%20Principle.pdf</a> ,There is far more than a “plausible risk” that adding additional greenhouse gases to the atmosphere will increase the adverse environmental damage of climate chaos.	
Lanny Sinkin	Temple of Lono	Every day brings new evidence of this reality. See e.g. <a href="https://thinc.blog/2024/05/25/mexicosheat-dome-is-deadly-relentless/">https://thinc.blog/2024/05/25/mexicosheat-dome-is-deadly-relentless/</a> On May 29, 2024, the temperature in Delhi reached 52.9 degrees celcius (127.22 degrees fahrenheit). As emissions of greenhouse gases continue, the planetary temperatures will continue rising placing hundreds of millions of people at risk of living in an uninhabitable environment, causing mass migrations across the planet, and extinguishing of other species. A threshold question is why the war makers are allowed to contribute to a process that could bring an end to civilization as we know it. The “No Action” alternative is the best for the Human Family and the rest of the Natural World. Lanny Sinkin Representing the Temple of Lono	Please see General Response 1.
Lanny Sinkin	Temple of Lono	The Army’s claim that it cannot prepare a quantitative, full life-cycle analysis of GHG emissions is extraordinarily self-serving. The Army has a clear reason for not producing such an analysis. The likely outcome would be a conclusion that the military is a large – perhaps the largest -- single major contributor to global climate change.	Section 3.6.2 explains why a quantitative, full life-cycle analysis of greenhouse gases has not been performed. Section 3.6.6 provides a qualitative analysis of the direct and indirect greenhouse gas emissions from the Proposed Action alternatives. HEPA does not require a quantitative analysis of greenhouse gas emissions.  Text added to Section 5.2 (incomplete information/unresolved issues) to elaborate on the lack of available information to conduct a quantitative analysis of greenhouse gases and associated social costs as well as the reasons for proceeding without resolution.
Jake Smith		STOP THE BOMBING! Demilitarize Pohakuloa NOW! KEEP HAWAIIAN LANDS IN HAWAIIAN HANDS!	Please see General Response 1.
Malia Smith		i write in strong opposition to the military's continued lease at pohakuloa. the military seized this land and paid a disgraceful \$1 to "lease" it, when it should rightfully be returned to the community who can steward it with the care it deserves. the army's bombing activity is	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		unacceptable desecration and threatens the viability of the land as critical habitat for local species. stop the bombing, stop the occupation, clean up the land, and give it back. do the right thing.	
Chanel Souza		As a resident of Hawaii, I feel a profound obligation to voice my concerns about the US military's presence in our state. The long history of military occupation has left a detrimental impact on our environment, disregarding the rich cultural heritage and natural beauty of our islands. It's imperative that we address these issues and work towards a more sustainable and respectful relationship with our land and communities. Simply put it, the US military is not welcomed in Hawai'i.	Please see General Response 1.
Richard Spotts		Overall, this compelling science demonstrates the urgent need for bold and innovative solutions. Questions arise like: how can fossil fuel use be reduced and replaced by clean, renewable energy sources? How can any destruction, degradation, or fragmentation of wildlife habitat be avoided, reduced, or successfully mitigated? How could construction materials be sourced from sustainable producers and practices? How could the use of any toxic chemicals be replaced by safer alternatives? How could gains in energy and water conservation be achieved? How could any harmful invasive plants be prevented, controlled, reduced, or eradicated? Please consider these questions in moving forward. On this specific proposed action, I am concerned about the DEIS action alternatives that would all cause significant adverse impacts and those impacts would likely not be adequately mitigated. I therefore must support the No Action Alternative. It would be the most environmentally responsible choice. Our national security is very important but it should not conflict with the compelling urgency of solving the climate and extinction crises. Thank you very much for your kind consideration of my comments and the attachment.	Please see General Response 1.
Richard Spotts		I appreciate this opportunity to provide comments on this second DEIS and proposed action.  At the outset, I believe that this and other federal planning	The EIS recognizes the potential effects of climate change. Section 3.6.6 provides an analysis of climate change impacts on the Proposed Action as well as the Proposed Action's potential contributions to ongoing

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>and NEPA analysis processes should actively consider how the proposed action and alternatives may add to or help solve the climate and extinction crises. These overlapping crises pose an existential threat to humanity and the health of the biosphere. On the climate crisis, please review the attached IPCC report. This report summarizes the overwhelming international scientific consensus on the severity of the climate crisis and the urgent need to phase out the use and development of fossil fuels. On the extinction crisis, there are an increasing number of scientific reports on the rapid loss of biological diversity and how this loss undermines the stability, resilience, and productivity of the ecosystems upon which life on Earth depends.</p>	<p>climate change.</p> <p>The EIS recognizes the extinction of species in the past as well as the dangers of extinction to existing species. Section 3.3 provides a summary of existing conditions and an analysis of potential impacts on biological resources, including protected species.</p>
Michael Stacy		<p>Recently, the U.S. military has been upgrading and/or replacing facilities at this base, as visible from the public roadway that divides the base. The total costs for these upgrades are not readily available to the taxpaying public, who is required to pay for them. As the facility is used for "live-fire" training, there must be large tranches of weapons and munitions in support of training sessions. The "live-fire" training results in environmental degradation, which must be cleaned up sometime. In my humble opinion, the monies spent on facility upgrades and replacements would be put to better use in removing the facilities and restoring the environment to the condition prior to the U.S. military entering the land. The presence of the U.S. military in Hawaii, instead of making us safer, actually makes us a target, and hence, less safe. According to 2015 figures, there were over 800 U.S. military bases in over 70 countries, which has only increased in the last 9 years. It is past time to close bases around the world, end forever wars, honor and protect military personnel, and bring them home. I respectfully request that the proposed lease extension past 2029 be denied, and the Hawaii people and environment be respected, and damaged areas be restored. What was done to the island of Kaho'olawe by the U.S. military must not be allowed to continue here, or anywhere else.</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
Laurel Stacy		<p>Respect the people and the land. Get rid of the U.S. military bases in Hawaii. They are making us targets for foreign powers. We are a peace-loving people who demand respect without being bullied. "Love the people, love the land."</p> <p>By the way, stop planning for a war with China in 2025! It is sheer insanity to plan for a war with a more technologically advanced country, and with a population 4x the U.S. How about trying harder with diplomacy. Are you people so delusional that you honestly think you can win a war with China, or that the concept of preemptive first strike will save anyone?</p>	<p>Section 2.2.6 added and Table 2-2 revised to consider other alternatives mentioned by the public during the Second Draft EIS public review period and previously addressed in the Analysis of Alternatives Study (2017). These alternatives do not meet the purpose and need of the Proposed Action and do not meet the screening criteria; therefore, they were considered and eliminated from detailed study in the EIS.</p>
Julie Stowell		<p>I am firmly opposed to the Army's retention of any of the "State" lands at Pohakuloa. I support the "No Action Alternative" that would allow the lease to expire and require the Army to comply with all the lease terms that include the clean-up of these lands. This land is not your training ground. The Army has had 65 years to show us what kind of stewards they are to our precious Aina. The Army has admitted it does not know the extent of contamination and whether it can be required to clean it up. We do not want this pattern of harmful behavior to continue. No more polluting of the Aina. It is time for the Army to meaningfully engage the community on a clean up plan that returns the land to the those that love and will properly care for it. It is time for the Army to return these "ceded" Hawaiian lands that were illegally seized. The Army is proposing to further pollute and contaminate these lands for an unknown number of years. They also presume they will clean up and restore the lands later even though their lease limits clean up to existing technologies and costs that "would not exceed the fair market value of the land", this means they may not even have a budget to clean up and restore the land. How will the Army fully clear and restore the lands after their use? Many concerned in our communities have expressed to you the impact of the long-term occupation of these lands and the presence of the US military in our islands. Our comments have raised the impacts of this occupation and the EIS should follow suit. The people come out every</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		time there is a public process and it seems the concerns fall on deaf ears. We are affected, our land is affected, our water is affected, our air is affected and the future generations will be affected if things do not change. Please listen to the people. It is time to clean up the mess and give the land back. And as Unko Hank Fergerstrom would say, "Show us the treaty".	
kestrel swift		I strongly oppose the proposed Army Training Land Retention at Pohakuloa Training Area on the island of Hawai'i. Pohakuloa is a wahi pana of great importance to Kanaka Maoli. The bombing of this scared land for the sake of war games is unacceptable. The Army's history of destruction in Hawai'i should come to an end-- the lease should not be renewed. I strongly oppose the renewal of the Army's lease at Pohakuloa.	Please see General Response 1.
John Swindle		I am a US Army war veteran living on the Island of Oahu in Hawaii. I am troubled by the prospect of continued Army use of the Pohakuloa Training Area. US military stewardship of the land is a mixed bag. It keeps down numbers of invasive Homo sapiens at the cost of despoiling the natural environment. I say enough already.	Please see General Response 1.
Kari Tamblyn		LAND BACK	Please see General Response 1.
Jane Taylor		The land should revert to the state and the military should no longer continue at Pohakuloa. That behavior is a remnant of our colonial past and is not acceptable. This is an entirely unique location which should be protected simply for its own sake, for ecological and cultural and geological reasons and not used in such a manner ever again. Find a less unique place for training. It is places like this we should be protecting not desecrating. This is my second comment saying the same thing.	Please see General Response 1.
Laulani Teale		What is RIMPAC?RIMPAC is the largest naval exercise in history. It takes place every two years in and around Hawai'i. This year, RIMPAC is scheduled for June 26th to August 1, 2024. 22 countries will participate.Why is RIMPAC harmful?Colonial Violence: Prior to a 1893 invasion and subsequent occupation by the United States, Hawai'i was a peaceful, neutral country that served as a hub of peace for the Pacific and the world. In fact, the	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>concept of neutrality was largely pioneered by the Hawaiian Kingdom. Kanaka Maoli have been diligently appealing to the US, UN and other bodies for a peaceful return of our independent, neutral country for over a century. Destructive militarization of Hawai'i is an unacceptable act of colonial violence that needs to stop. RIMPAC also violates the important international concept of Free, Prior, Informed Consent (FPIC) by Indigenous Peoples. Kanaka Maoli do not consent to RIMPAC, and never will. Environmental destruction: RIMPAC exercises include extreme impacts to ocean health, destructive activities such as the killing of whales, dolphins, sharks and other marine life sacred to Kanaka Maoli, the bombing and sinking of toxic decommissioned vessels, and amphibious assaults in turtle nesting grounds, amongst many other harmful activities. Sacred areas are bombed, shelled and invaded. Tens of millions of gallons of fossil fuels are used for these war games; the climate impact is severe. Biofuels used in RIMPAC are taken away from community circulation, so they do not actually offset anything. Human Impact: 25,000 sailors on an island that does not want them means an increased risk of fights and violence, increased sex trafficking, and cumulative impacts to Kanaka Maoli chronic health problems (including extreme rates of heart disease, cancers, diabetes, depression and much more) that have been correlated with ongoing US occupation and militarization. It also means demand on our water table, which is already in a state of crisis due to military fuel spills. There is also a global impact, via war. Israel will be bombing Hawai'i this summer, as it is bombing Gaza. Hawai'i stands in peaceful solidarity with Palestine! What Are the Solutions? End RIMPAC now. The time in human history for massive Earth-destructive war games is over. World superpowers should be gathering to clean up the mess they have made, not to make more of it. De-fund this oceanic horror and work together, under Indigenous leadership, to heal all of the damage that has been done to our beloved Mother Earth. Liberate Hawai'i and support peaceful restoration of Independence. When our Queen was violently deposed in</p>	

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>1893 (for proposing a Constitution that would have given voting rights to impoverished Kanaka Maoli and Asian laborers), she gave a clear directive to her people: Onipa’a (move together in a steadfast way); do not fight back with violence, but never give up. Kanaka Maoli have been appealing to the “honest Americans” for many decades, for full restoration of our country. This is the ONLY way to peace in Hawai’i, and in the world. A free, neutral, Indigenous-led Hawai’i would be a shining beacon of peace in the Pacific, as it was in 1893, as opposed to a toxic parking lot for war and continued rape and pillage of our lands and people.</p>	
Laulani Teale		<p>Pōhakuloa: What is going on? Lands belonging to the Kingdom of Hawai’i (improperly referred to as “ceded” lands) that were seized during UStakeover of Hawai’i, have been leased to the United States military, who has bombed and polluted them extensively, continually expanding their area of impact. The US Army currently has a proposal to continue to occupy 22,750 acres of leased State land at Pōhakuloa Training Area (PTA) for an undetermined amount of time, in addition to 84,057 of Hawaiian land that was stolen via an Executive Order in 1964. Kanaka Maoli have never consented to any of this, and do not consent now. This is one of many military lease renewals that will be under very serious contention in the next few years. What is the opposition to lease renewals? Land Theft: Prior to a 1893 invasion and subsequent occupation by the United States, Hawai’i was a peaceful, neutral, fully independent country. The people of the Hawaiian Kingdom have never consented to US rule, and Kanaka Maoli have increasingly, strongly opposed continued US occupation. The lands in question legally belong to Hawai’i as an independent country, as there was never a treaty with the Kingdom that was illegally deposed, nor any legal reason for the invasion or taking of its lands. It is important not to continue colonial land theft against the wishes of the rightful people of the lands in question. This is an unacceptable act of military aggression that must stop immediately. Destructive militarization of Hawai’i is an unacceptable act of colonial violence that</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>needs to stop. Forcible lease renewals also violate the important international concept of Free, Prior, Informed Consent (FPIC) by Indigenous Peoples. Kanaka Maoli do not consent to military lease renewals at Pōhakuloa, or anywhere else. Destructive Militarization: Pohakuloa is bombed, shelled, burned and otherwise harmed as part of RIMPAC, the world’s largest and most destructive . This must stop. Militarization also threatens Hawai’i as a “First Strike” community continually endangered by the presence and international aggression of the US military. We could all die in a nuclear attack, and this is not ok.</p>	
Laulani Teale		<p>Native bird researchers pointed out six species of native birds have disappeared from Pōhakuloa while the Army has occupied these lands. In response, the Army lists “management measures” developed since 2003. These measures are clearly not working. The Army’s military activities cause fires that have burned through thousands of acres of listed plant habitat and subject native fauna to chronic stress. Yet, the EIS says wildlife can be “habituated” to noise and concludes, with no evidence, that this is ok.</p>	<p>Existing management measures are outlined in Section 3.3.4.5 Table 3-12. A more extensive list of management measures is located in Appendix E.</p> <p>Additional wildlife noise studies have been added to Sections 3.3.4.4. and 3.7.4.</p>
Laulani Teale		<p>Climate Impacts: Militaries are notorious for not reporting greenhouse gas emissions. The Army at Pōhakuloa admits that their EIS does not include an analysis of greenhouse gas emissions (GHG) from their occupation, stating “there are no data inputs reasonably available to support such calculations for a real estate transaction such as the Proposed Action.” GHG emission studies are regularly submitted as part of EISs and other processes. The Army just does not want to own up to its impacts</p>	<p>Section 3.6.2 explains why a quantitative, full life-cycle analysis of greenhouse gases has not been performed. Section 3.6.6 provides a qualitative analysis of the direct and indirect greenhouse gas emissions from the Proposed Action alternatives. HEPA does not require a quantitative analysis of greenhouse gas emissions.</p> <p>Text added to Section 5.2 (incomplete information/unresolved issues) to elaborate on the lack of available information to conduct a quantitative analysis of greenhouse gases and associated social costs as well as the reasons for proceeding without resolution.</p>
Laulani Teale		<p>Environmental destruction: From KAHEA: For decades, the Army has been contaminating Pōhakuloa lands with hazardous contaminants that keep accumulating. Their current lease does not require full clean up if there is no “technical and economic capability” and only if “expenditure for removal would not exceed the fair market value of the land.” The EIS never discloses the</p>	<p>The extent to which cleanup could be accomplished within technical and economic capabilities is subject to several items such as negotiation with the State, regulation changes (e.g., future regulatory requirements), and future cleanup processes and costs. Section 5.2.4 revised with text regarding uncertainties associated with technical and economic capabilities for future</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>Army’s technical and economic capability nor the fair market value of the land and therefore the extent to which these lands can never be cleaned up. Continued occupation will continue to kill native wildlife. Calling its plans a “real estate” action, the Army says “ongoing activities would remain the same.”</p>	<p>cleanup. The fair market value of the land would be determined following completion of the NEPA/HEPA process.</p>
<p>Logan Terkelsen</p>		<p>It's an absolute travesty the way that native peoples are regarded in this country. First colonists eradicated most everyone then took their land then destroyed it to build a shopping mall or for the sake of military power in this case. Colonization continues today with such acts as this army base, the TMT and other illegal desecration and occupational acts. I'm native Hawaiian. I did not grow up on the islands. I do however feel a strong connection to fellow Kanaka Maoli and the Aina. Do what you know is the right thing, give the Hawaiian people their land back and atop bombing the land. Everything the army does in Hawaii is against all that Hawaiians stand for and believe in. Have some respect for once and do what is right for native peoples. You know that bombing sacred lands should not continue so make it stop. Thanks for your time.</p>	<p>Please see General Response 1.</p>
<p>Chariya Terlep-Cabatbat</p>		<p>Mahalo to everybody who spoke before me. I really appreciate you guys. And seeing like the ‘ōpio here and giving their mana'o and their testimony really gave me courage to come up here today. I wasn't going to, but I was compelled and I felt am I not (inaudible) to stand up? So the military says they're -- O wau o Chariya Terlep-Cabatbat. I am from Hawaii. I live in Puna. So the military says they are cultural and non-stewards and that they clean up. I'm just wondering how. Most recently that I can think back to December 22nd when Mauna Loa was erupting, unexploded ordinance was found on the mitigation rolled. I can't imagine how many more unexploded ordinances there are that are not discovered. You mentioned quick responses to fires. I sure hope so. The military causes them, multiple brush fires. In 2022, the PTA burned excess of 10,000 acres. And I'm just going to share some facts that I feel are important to mention while I'm up here. Native Hawaiian girls represent a disproportionate number of missing children in Hawaii.</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>This was released by Hawaii News Now in December 2022. More than one quarter of missing girls in Hawaii are Native Hawaiian. This is alarming considering that Hawaiians are already a minority in Hawaii. And the fact that we make up more than a quarter of missing people is alarming. Now you're probably sitting there thinking, what does this have to do with you? Well, 38 percent of men arrested for trying to have a sexual encounter with a 13-year-old online have been active duty military. And this was published by Hawaii News Now. So with that being said, I'm here to say that I am for the no action alternative, no lease renewal, ho'iho'i 'āina, land back, bodies back. Mahalo.</p>	
Dillion Thomas		<p>Have a heart. Do not allow the desecration of native lands to continue. The only ongoing military presence should be an island wide cleanup and natural rehabilitation of the land. Thank you for reading.</p>	Please see General Response 1.
Anjani Thomas		<p>To Whom It May Concern: I am writing in support of “No Action Alternative” for the Pōhakuloa Training Area. To be clear, I am saying NO to lease extensions, NO to ongoing military training, NO land swaps, YES to restoration and clean up of Pōhakuloa, and YES to reparations to Hawaiians for destroying their lands. Thank you for your consideration of the people’s voice on this issue. Sincerely, Anjani Thomas Manoa Valley, HI</p>	Please see General Response 1.
Kupaianaha O Kākā'Ōlelo Thurman		<p>My name is Kupaianaha O Kākā'Ōlelo Thurman. I'm originally from O'ahu but I reside here on Moku o Keawe along the Hamakua coast. I didn't plan on speaking tonight. I originally came here just to listen and kilo and just to observe what was going on, but the longer I sat here I realized I couldn't, you know, leave here without speaking up for our 'āina. There's two reasons this holds dear to my heart. The first is because I am Kānaka Maoli on my mother's side. My Hawaiian family is the only family I've ever known, and I'm deeply connected with them and this 'āina. The second reason is because I also served in the U.S. Army. For seven years I was the airborne infantry. I was 19 years old when I first seen war. That was my first combat deployment. I'm 33 years old now and I'm still trying to heal from that, but I also believe it prepared me</p>	Please see General Response 1.

Responses to Second Draft EIS Comments

Commenter	Submitted By	Comment	Response
		<p>for this moment because I know how the U.S. Army operates. I know how you guys train. I know your tactics and I know why you guys want this 'āina. It's so you can continue to prepare for war. There is no other reason why you shoot live ammunition and bomb the land. And I know most of these meetings are just blowing smoke. I know the U.S. government, you know, they're not going to want to give this away at all, but our government, there is no accountability. That's why I want to hold you two specifically accountable because I know you two, as a full bird colonel, on the left side, and a lieutenant colonel on the right, you both have pull. In 2029 when the lease expires in the next five years, you guys won't be here. You both will be PCSing to another place or possibly ETSing and retiring. I don't know you guys' future but you guys are -- have already been in for a long time and that's why you need to do what's right. You guys need to start implementing and making plans on how to clean -- clean up Pohakuloa and getting ready to leave by 2029 because out of all this stuff, I haven't really heard, like what are you guys doing to implement the cleanup, you know. You guys want to stay here, and you guys want to extend the lease or buy the land, but what are you guys actually doing to mālama this area? And you guys need to actively act on it because what steps are you guys doing to remove all the toxins in the soil? Pohakuloa sits right in the middle of our two biggest sacred mountains in all of the Hawaiian islands. Our biggest aquifers sit right beneath Pohakuloa. You need to understand that all of our water is connected to one another, you know, our wai -- our water is the most sacred thing in life. There is no human, animal or plant on earth that can survive without it. But the thing is, we love this 'āina more than you do and we will stand up and fight for it. And so I ask you, you guys need to do what's right because, you know, there is going to come a time in the future when you guys are going to get out of the Army and, you know, you're going to have that consciousness on you, you know. You have all these Hawaiians, you have all of us that are like, telling you, you know, to do what's right. So you guys need to act on it. I wish I had more time,</p>	

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		and I would have prepared more for this, but I'm sure I'm going to be back again, so -- yeah. That's all I have to say. Mahalo.	
Brandi Tia		No more bombing! Protect our land and people from further destruction!	Please see General Response 1.
M Tomlinson		<p>From the continent: Get Out Of Hawai'i!! No to all your projects. The peoples Environmental Impact Statement says everywhere you are you cause Harm, Death, and Destruction. We Love Hawai'i and the only acceptable action for the military is to leave. Number one polluter in the world in the most remote and endangered place. Get out of Hawai'i and please feel free to start with Pohakuloa.</p> <p>-Upload is cutting off words like your and Harm also pretty telling you all ask to refrain from offensive language... when you are literally the offenders</p>	Please see General Response 1.
Mary True		Aloha, my name is Mary True and I am from Pepe`ekeo. I am writing in opposition to the Army's Proposed Action to continue their retention of approximately 22,750 acres of State-leased lands once the lease expires in 2029, either through a new lease or through purchase. I am in full support of the No Action Alternative, under which the State lands will be relinquished back to the State. Mahalo!	Please see General Response 1.
Leomana Turalde		Aloha. My name is Leomana Turalde. I'm a Marine Corps Combat Veteran, Native Hawaiian. I'm a NASA rocket scientist, and I did astrophysics as a scientist at Gemini Telescope. First of all, I just wanted to say I oppose the renewal of all of these leases. Sir, Lieutenant, please can you look at me? I -- I'm offended that they send you to broker this deal because you're in the infantry just like me. You don't have any experience with natural resource management. You're not a conservationist and you're here to hear us about the land deal and you're in the infantry. That's what you focus on. You don't know anything about the mountain. I know you love Hawaii. Your first duty station Oahu, right? On Oahu. I know that. I know you love my islands. Love me. Love me. Since the military got to all of these islands, my people are not here. The Hawaiians are moving. You focus too much on the mission, man. You're not focusing on us, us in this room. Us. We don't	Please see General Response 1.

Responses to Second Draft EIS Comments

Commenter	Submitted By	Comment	Response
		<p>need all the bombs up there. I dropped the bombs just like you did. Yeah. I see you. We dropped the bombs. I don't know this guy. I was at Fort Bragg. I was at Benning. I was at the Army Infantry and the Rangers. I was at the same places you were at. And now I'm here fighting for the land, fighting for the people, fighting for my people. Oahu, everybody got poisoned. Big Island, same thing. I dropped bombs on this base too. Did you? I did. I'm not proud of that. And I tell all my people, "I'm sorry. I'm sorry for doing that. I'm sorry for all the lies. I'm sorry for all the damage." I fucking hurt. I don't want to wear that stuff on my chest. You see that stuff you got on your chest? I took mines out because when I got up there, I saw what was going on. It's beautiful, isn't it, Mauna Kea and Mauna Loa? And you sit right in the middle. And we launch all the mortars and we watch the helicopters and we fucking launch the flares at night. Beautiful. That's why we have it. It's like a -- it's -- it's a military tourism. That's why you came back. That's why you came back to Hawaii. That's why you are still here. Care about me. Care about the things I'm saying. Care about my people. Look at everybody in the room, do they look like me? They don't look like me. That's because we're all gone. More Hawaiians live outside of Hawaii and you know who's here? You. You are here and him. And we're all in this room begging, "Please don't destroy the land. Please listen to us. Please help me. Please help." Call the last base commander from Kane'ohe in 2019. He didn't keep his promises and he lied. Do better. We don't need this base and you know that. All the millions of dollars that we spend getting all of our skills, it's not hard for me to come -- it's -- it's real hard for me to come up here and tell you this kind of stuff. I'm afraid to speak up against the empire. That's what it is. I'm afraid to come inside here and look at you and tell you the truth because you know, you know what I talk about. You know what I'm talking about. These people don't know. He don't know. I joined 2005 like you. I wanted to be a Special Forces pilot so I could be a -- a -- a -- a space shuttle commander. I ended up becoming an operator like you. Right? Infantry first, right? And then you become the operator and then</p>	

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		we go do all that bullshit. Look up my name, please. You know where I'm coming from. Please protect me. That guy cannot do nothing. Thank you guys for your time. Thank you, sir. Thank you, sir.	
Madeleine Turner		No lease extensions Stop military training No to land swaps We need Pohakuloa cleaned up Madeleine Turner	Please see General Response 1.
Mauna Kea Protectors at UCSB	Mauna Kea Protectors at UCSB	Mauna Kea Protectors at UCSB strongly oppose the attempted U.S. Military lease extension of Pōhakuloa. We implore all entities to consider the cultural and environmental impacts if this lease extension occurs. Militarization, particularly the U.S. military, has been a parasitic presence in Hawai'i. The colonial violence that began with the U.S. illegal annexation of the Kingdom is an ongoing pattern and can be seen in the PTA, where the site is used for extensive live-fire training exercises that include bombing and artillery practice. PTA is also used by other, foreign militaries through RIMPAC where they also have the ability to conduct their training. Military presence and training on Pōhakuloa has permanently changed the natural landscape and continues to endanger the environment, devastating for the one of a kind ecosystem. In 2005, cesspools were banned under the Safe Drinking Water Act under the UIC program but this unfortunately did not deter the U.S. Military from opening 8 illegal large capacity cesspools. Despite being fined by the U.S. EPA and being forced to close the cesspools, this mistreatment of land and wastewater should have never occurred. It is unacceptable. This environmental risk will only continue to exist if the U.S. Military extends their lease and continues to practice 'ownership' on sacred land that will never belong to them. As we advocate for the divestment of the Thirty Meter Telescope, we strongly condemn the violation of indigenous rights and sovereignty that the U.S. Military is committing. It is egregious that multiple military forces can breach on Pōhakuloa when cultural practitioners cannot even perform ceremony or have full, unchallenged indigenous stewardship of their lands. For the protection of the tropical dryland forest and indigenous sovereignty, there	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		cannot be a lease extension in Pōhakuloa and we urge you to reconsider.	
Mike Waimea		I support alternative #2 and believe there needs to be a balance between training our service members/national security and taking care of the Aina. the Army must demonstrate that this is not business as usual and there needs to be a balance. The nation's security is at risk with the growing threats in the Pacific and we need to be ready. Similarly, we must do everything to convey respect and openness to doing things differently. I support Alternative #2 and also having the Army demonstrate their kokua to the community and the land. Mahalo.	Please see General Response 1.
Lyn Wandell		This land needs to be conceded back to the people. The military have not used it for not good purposes and have decimated the aina!	Please see General Response 1.
Deborah Ward		Thank you. Aloha. My name is Deborah Ward. I worked at the University of Hawaii for 25 years and I have been farming for 23 years. And I live in Mountain View. I would like to speak for a dear friend of mine who passed away at the age of 42 after single handedly fighting the army to close off the multipurpose range complex at Pohakuloa because she had done research up there on the plants and -- and flora that -- that were native and critical to the area that she was studying. She died of cancer at the age of 42 after winning her battle with the army to shut down the NPRC. We are not happy and we're not willing to put up with this many more years of occupation. We object to the bombs, the trash, and the pollution and the arrogance that comes with it.	Please see General Response 1.
Deborah Ward		This is sacred land and it contains standing stones that relate to the standing stones on Mauna Kea that were used by kānaka of old and now that relate to astronomy. We do not appreciate the idea that you would exchange the land or that you would change the conservation district. We don't really want you here as an occupier. We do not believe that you will ever clean up this land and you are not being truthful or transparent. This EIS is deficient and defective and the entire premise is unacceptable. Why have you removed 700 pages of the cultural impact statement from this -- from the EIS? I -- I	The first draft CIA was revised to improve readability, focus analysis within the project area and broad geographical area, and add information from new survey respondents and interviews. No information provided by the interviewee and survey respondents was removed from the DEIS CIA. Section 2.2 discusses alternatives considered.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>find it impossible to respond to 3,000 pages of an EIS in three minutes. You must be joking. Thank you for your time. I cannot begin to explain how not happy we are with the ideas that you proposed. You must explore other alternatives that do not involve using the land of Hawai'i. Thank you.</p>	
Deborah Ward		<p>Don Thomas, the UH geologist, found high-level water under PTA and we -- we've been waiting for years to learn if the contaminants were found in the water. The information has not been released despite many requests over several years.</p>	<p>The best available scientific data for groundwater and surface water quality was incorporated into this EIS. Groundwater and surface water quality are discussed in Section 3.9 of the EIS. Section 3.9.4.6 of the EIS documents the existing management measures utilized by the Army to protect water resources. The State Department of Health (DOH) Safe Drinking Water Branch (SDWB) monitors groundwater quality of aquifers as described in EIS Section 3.9. SDWB has released groundwater contamination maps for Hawai'i Island that show most contamination is along the eastern coast of the island. The DOH SDWB Environmental Health Portal can be accessed at <a href="https://eha-cloud.doh.hawaii.gov/sdwb/#!/home">https://eha-cloud.doh.hawaii.gov/sdwb/#!/home</a></p> <p>Section 3.9.4.2 has been updated to include additional information from the Thomas (2019) report. A link to this report has been added to the PTA EIS website (<a href="https://home.army.mil/hawaii/ptaeis/project-home">https://home.army.mil/hawaii/ptaeis/project-home</a>) under the "Documents" tab.</p>
Deborah Ward		<p>Six species of native birds have disappeared from PTA during the Army occupation, thousands of acres have burned and fires occur many times every year. Helicopters fly during the fledging of the birds and the birds are not habituated to the noise and the disruption, as you say; instead, they've died or disappeared from critical habitat.</p>	<p>Section 3.3.4 has been updated with more recent scientific data and surveys. Wildland fire analysis in Section 3.3.6 has been revised.</p> <p>Mitigation measures the Army would consider include: (1) a multi-year research project to identify possible biological controls in the native range of <i>C. setaceus</i> (fountain grass); (2) installation invertebrate surveys; (3) an ungulate impact assessment; (4) negotiation of an agreement with the State to monitor wildfires on land not retained; and (5) implementation of additional thermal technology. These mitigation measures have been added to the Mitigation Measures subsection.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
Rick Warshauer		<p>While doing the 1977 survey work at PTA (and also at Makua Valley) I came close to being injured or killed by unexploded ordnance. At PTA, it was intervention by an army EOD person who stopped us from hitting the trip wires from aerially dispersed anti-personnel mines. This and other unexploded ordnance is a blight that will remain to threaten future use of the land, and it cannot be cleared from the land. It is a permanent presence on the land used for military training. Following the decision to stop military bombing and shelling of Kaho'olawe island, there was a futile attempt by the Navy and its contractors to clear the ordnance from the land. It was expensive and it failed miserably, causing extensive physical damage and catastrophic fires. The risk and threat to man and restoration activities remains on the land and the offshore waters. Upon joining restoration planting activities years later, we were not able to travel beyond the near-barren surface areas and could not do any sort of digging during the planting and irrigation of large numbers of native plants. All was done by volunteers and hired managers funded by the state of Hawaii. The military had left, and it left its mark and burden for others to bear. The threat from ordnance will remain for the long term at PTA as well and any activities and future use on the landscape there. This will have to be factored into any planning for the land's future. The bulk of PTA lands will need to be left for nature to restore itself. This time, however, the Department of Defense cannot just drop a few bucks for show and walk away. There needs to be much more discussed and done.</p>	<p>As noted in Section 2.1, in accordance with the lease and under the provisions of existing law, the Army retains responsibility for cleanup of closed ranges (i.e., State-owned land not retained). After the current lease expires, the Army would follow federal law and regulations to determine how and when cleanup and restoration activities for hazardous substances and MEC within the State-owned land not retained would occur under the CERCLA process. The Army would coordinate these actions with the State of Hawai'i. Text such as "if deemed necessary," "to the extent practicable," and "to the extent feasible" associated with cleanup and restoration activities deleted throughout the EIS. Text added to Section 2.1 to state that the Army would follow the CERCLA process in accordance with applicable DoD and Army regulations and processes. The CERCLA process includes phases including preliminary assessment/site inspection, remedial investigation/feasibility study, remedial design/remedial action, and post-construction completion phases.</p>
Rick Warshauer		<p>2-- Any continuation of either or both live firing and vehicle and troop maneuvers have associated with them unavoidable risk of fire ignition. This will only increase with drier climate conditions that are projected for Hawaii's drier regions, including those at PTA and adjoining state, private and DHHL lands. Past fire history on the islands shows fires spreading across boundaries as the rule, not the exception. The DEIS should offer a serious discussion of the benefits of ceasing live firing and vehicle</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		and troop maneuvers permanently at PTA for both the 'aina at PTA and that of its neighbors.	
Rick Warshauer		<p><b>GENERAL CONCERNS AND RECOMMENDATIONS</b>The long-standing concerns over the biological consequences of military training at Pohakuloa Training Area (PTA) derive from the situation that PTA contains the richest and most pristine dryland biota remaining in the Hawaiian Islands. Three diverse biotic assemblages meet at PTA, and the last and best remnants of two of them are on the installation. One, the last remnant of a diverse shrubland, formerly extended across the driest parts of northwest Mauna Kea and now is found only at Kipuka Kalawamauna and immediately northwest of Puu Ka Pele. This is a large relict of Mauna Kea land surface long isolated by Mauna Loa lava flows and more recent cattle fences. Second, an encircling band of Mauna Kea montane dry forest extends downslope to Mauna Loa in the north and northeast edges of PTA and onto some northeast cinder cones. The latter are surrounded by relatively lightly vegetated Mauna Loa lava flows. Third, to the southwest lie a suite of dry forest and scrub communities which represent several degrees of ecosystem succession (scattered pioneer plants developing into 'ohi'a forests, and then maturing to mamane-naio forests) of the unique Mauna Loa-Hualalai central plateau area. The best examples also lie within PTA, again because of relative protection from grazing and browsing. These various plant communities are habitat for a rare invertebrate fauna that is equally special and appears to be in a better state of preservation than is the fragmentary bird life. Thus, at least the western third of Pohakuloa Training Area (PTA) contains the finest and most extensive dryland ecosystems remaining in Hawai'i, an area that is of national park quality. Within the area are numerous rare and endangered species, and presently most still remain in self-sustaining populations. This is a situation of unusual rarity in Hawaii, and is deserving of very special and sensitive treatment. Certain small portions have been selected for fencing, and presumably the damaging ungulates within them have been removed (unless that removal is completed, the confining fences</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		may well concentrate the ungulates' damaging browsing within the fences and therefore be counter-productive).	
Rick Warshauer		My involvement with PTA goes back to January, 1977, when I spent time doing botanical surveys as contributions to a planned but never released EIS for PTA. Subsequently, over the next few decades I have written advisory scientifically based commentaries on various proposals and activities of the military at PTA, both as an agency person and as a private individual. Some changes have been made at PTA; some bad projects have been prevented or modified; but overall, the continued military training has been cumulatively very detrimental to the 'aina at PTA, and particularly so for its native plants and animals. If these or similar training activities are continued it is inevitable that much more will be lost forever. Not only has the land at PTA suffered as a result of military use and management decisions, but also the adjacent state, private and DHHL lands and the travelling public are facing ever-expanding risks and damage due to ungulates and fire. It is also true that all this training could be done on the US mainland instead of at PTA. This is what should be done. Our lands have made their contributions to the nation's security for well over a half century and at a great cost. Now the Department of Defense and the country need to end field training at PTA. The Department of Defense needs to take responsibility for the consequences of its use of the land and to do what is pono and right for the 'aina and residents of Hawai'i. It is time for change and restitution.	Please see General Response 1.
Rick Warshauer		1-- What are and have been the effects of military training activities on nesting activities of the Hawaiian Petrel ('ua'u) and the Band-rumped Storm-petrel ('ake'ake) on or near the PTA controlled lands, and also on these birds that transit PTA lands on their way to breeding activities elsewhere on Mauna Loa and Mauna Kea? PTA activities affect rare species away from PTA itself.	In 2016, it was determined that Hawaiian petrels do not use habitat at PTA; they have only been observed flying over the installation. PTA continues to monitor Hawaiian petrel detections at the installation.
Rick Warshauer		3-- The Department of Defense's maintenance of breeding ungulates on PTA lands has been cumulatively destroying the native biota at PTA and fostering emigration ungulates to do the same on adjacent public, private and DHHL	Sections 3.2.4.2 and 3.3.4.2 have been updated with additional information on public hunting and PTA game management. In compliance with the 2022 PTA hunting policy and iSportsman management, and pending

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>lands. Driving the Saddle Road provides one with ample evidence of this in the form of abundant dead mamane and naio trees, aweoweo shrubs and absent much else native, stark browse lines on surviving trees, near-bare and eroding ground, and dead ungulates along the roadside. Vehicle-ungulate collisions are common, as evidenced by the roadside carcasses. PTA management strategies foster the breeding and spread of these ungulates throughout PTA and onto adjoining lands. Thus, PTA and the Department of Defense have responsibility for the adverse outcomes described above, including degradation of the ‘aina, loss of native species, and liability for ungulate collisions with traffic along the Saddle Road. The Department of Defense should fund PTA to complete quickly an ungulate proof fence to prevent ungulate movement out of PTA. This should accompany effective eradication of these animals from within PTA to eliminate future ungulate impacts on the PTA ‘aina. Both actions would benefit the highway travelers and neighbors’ lands. The DEIS should acknowledge and discuss the foregoing issues and present practical and effective plans to correct them ASAP.</p>	<p>training compatibility, the Army permits public hunting on PTA on weekends and national holidays.</p> <p>The Army has conservation law enforcement officers and game management support that work to control ungulates at PTA and support the hunting program. The Army would consider an ungulate impact assessment as a mitigation measure.</p> <p>Management of wild ungulates outside of the PTA boundary is beyond the scope of this EIS.</p>
Rick Warshauer		<p>4-- Should the Department of Defense decide to retain the approximately 110,000 acres that the U.S. expropriated from Hawai’i, it should change its activities on the land away from current training to alternative Defense Department activities. It should consider use of most of the land as a conservation-managed mitigation area to compensate for past and ongoing training activities in Hawai’i and the Pacific. To do so, all the land away from the main complex of buildings and airfield should be freed from ungulates and transitioned to restoration actions. These should include restoring native species, as has been done so well by Department of Defense-funded work on O’ahu. Perhaps the main buildings and airfield could be used to house and develop cyber warfare. Could Space Force activities and structures be transferred from Haleakala to PTA facilities? The DEIS should discuss all of these alternatives to current usage or retention of the land.</p>	<p>The Army has conservation law enforcement officers and a game management official to work to control ungulates at PTA and support the hunting program. The Army would consider an ungulate impact assessment as a mitigation measure.</p> <p>Sections 3.2.4.2 and 3.3.4.2 have been updated with additional information on public hunting and PTA game management. In compliance with the 2022 PTA hunting policy and iSportsman management, and pending training compatibility, the Army permits public hunting on PTA on weekends and national holidays.</p> <p>Section 2.2 addresses alternatives considered for the Proposed Action.</p>

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
Kano Watanabe		The militarization of these islands, including the bombing experimentations in multiple sacred land areas is a continuation of violent colonization. The use of Hawaiian land for military experiments is disrespectful to its people, ancestors, native ecosystems, and overall health of the environment. Stop poisoning the land and water systems of Hawai'i. 'aina back.	Please see General Response 1.
Debbie Watson-Correa		I strongly support the retention of the Pōhakuloa Training Area (PTA). This facility is crucial for our national security and regional stability, enabling joint military training with our Indo-Pacific allies. The PTA helps counter the encroachment and harmful practices of the People's Republic of China, which threaten our ocean's ecosystem and Hawai'i's fishing industry. Maintaining PTA ensures we can continue protecting our environment and supporting our local economy. Thank you for considering my support. Sincerely, Debbie Watson-Correa Have a blessed day!	Please see General Response 1.
Linda Williams		Aloha, my name is Linda Williams. I am a resident of Hawai'i, living in Hilo. I am submitting testimony in opposition to extending the lease to the US Army at Pōhakuloa. The lease must not be renewed, in fact, all of the land must be returned to the state and restored when the lease is up. That's my testimony. Thank you.	Please see General Response 1.
John Witeck		Pohakuloa should be cleaned up and made safe, and then returned to civilian control and used for peaceful purposes and not for training for war. The land should ultimately go back to its original indigenous caretakers, the Kanaka Maoli.	Please see General Response 1.
Katriel Wong		The U.S. military may argue that these lands are used for the "good of mankind" and the protection of our islands, however these arguments resemble the same language used to persuade people in the Marshall Islands, Nevada Test Site, and Hanford facility— all victims of radioactive testing. For too long the U.S. military's pursuit of strategic power has outweighed the consideration of the environment and health of the people of Hawai'i. This issue extends to both Kanaka 'Ōiwi and non-Kanaka on evaluating the importance of social justice, environmental stewardship and the health of the people of Hawai'i. For these reasons, I encourage the Board of Land and Natural	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		Resources and State of Hawai'i to end the decades of land misuse and work towards restoring the natural resources of these sites. Mahalo nui, Katriel Wong	
Katriel Wong		<p>My name is Katriel Wong and I am a medical student and anthropologist from Honolulu, Hawai'i. I am writing in opposition of the state renewing their contract or selling Pōhakuloa, Mākua, Kahuku and Kawaiiloa to the US military.</p> <p>Since the 1940s U.S. weapon testing has destroyed the natural landscape of these sites and released toxic substances like depleted uranium into the environment. Depleted uranium (DU) is a radioactive waste product from missiles and nuclear weapons used by the U.S. military in the 1950s and 60s. Approximately 70% of DU converts into nano-particles that can be inhaled and enter the bloodstream; with a 4.5 billion year half life, DU presents a significant risk to human health. In a study by Alice Deikirk (2009) she concludes that, "the long half-life of depleted uranium, the continual military testing of munitions on the site, and frequent fires that stem from those tests, there is a strong likelihood that questionable levels of radiation exposure are still occurring." Although the U.S. military denies DU emissions, there has been a lack of air/water quality testing for DU conducted by an impartial agency. Furthermore, given the U.S. military's initial denial of the Red Hill poisonings, it is reasonable for the public to be suspicious of their so-called "safety" claims.</p>	<p>Sections 3.5.4.11 and 3.5.4.12 describe the lack of mobilization of munitions constituents, including depleted uranium, within soil, groundwater, and surface water. The text notes that risk of contaminants mobilizing is not a concern as limited surface water and groundwater pathways on State-owned land pose minor potential impact to soil and groundwater quality.</p> <p>The best available scientific data for groundwater and surface water quality was incorporated into this EIS. Section 3.9.4.6 documents the existing management measures used by the Army to protect water resources. The State Department of Health (DOH) Safe Drinking Water Branch (SDWB) monitors groundwater quality of aquifers as described in Section 3.9. The DOH SDWB has released groundwater contamination maps for Hawai'i Island that show most contamination is along the eastern coast of the island. The DOH SDWB Environmental Health Portal is available at <a href="https://eha-cloud.doh.hawaii.gov/sdwb/#!/home">https://eha-cloud.doh.hawaii.gov/sdwb/#!/home</a>.</p> <p>Sections 3.5.4.12 and 3.6.4 contain a discussion on depleted uranium and the Army's 2009 air quality monitoring program, which concluded that depleted uranium had not impacted air quality at PTA or in the surrounding area and that the spotting rounds were low-velocity projectiles that typically broke into large fragments upon impact and did not produce sub-micron-sized depleted uranium particles. The depleted uranium fragments likely washed into crevices between exposed lava flows.</p> <p>With respect to the study by Alice Deikirk (2009), the DoD does not "test" any military munitions at PTA and per DoDD 4715.11, Environmental and Explosives Safety Management on Operational Ranges Within the United States, paragraph 5.4.9.2, high-explosive munitions shall</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
			not be fired into the same area as depleted uranium (e.g., the impact locations for these four ranges); therefore, the depleted uranium impact locations are not disturbed by explosive munitions associated with ongoing activities.
Leanne Wood	Friends for Fitness	<p>Aloha!It is hard to find the appropriate words to express our gratitude for all the help the eleven PTA soldiers provided at our Volunteer Clean Up Day held on Saturday, May 25 at the Maka'eo Trail in Kailua Kona's Old Airport Park! On behalf of the Maka'eo Jogging and Walking Trail volunteer maintenance gardeners and the Friends for Fitness organization, we would like to sincerely thank the PTA soldiers who gave their time, strength and energy to help us maintain the public walking/jogging trail and the gardens that the public enjoys!We certainly could not have accomplished all that we did without the PTA soldier's hardwork and commitment. They were a fine group of young men and women and we were totally impressed with their diligence to getting the work done. They worked well together despite the humid conditions, and thanks to them we removed all of the interior trail green waste piles that had been an eyesore, as well as removed tons of invasive pickle weed plants from the ancient anchialine pond. We were very thankful to have them assist us at this community event to improve one of the few parks we have in Kailua-Kona town. Several walkers have already expressed their thanks while I was down at the park this morning! Amazing job PTA soldiers! Our hearts are touched and we appreciate you so much! Thanks for giving back to our community here on the Big Island!Mahalo nui loa to you the hard working men and women in our U.S. military!</p>	Please see General Response 1.
Lelaine X		<p>I am not under any delusion that anything I say will make a difference in your decision-making, so my purpose is to add my voice to the formal record to say: we see you and how you move and based on that experiential knowledge, do not believe any promises or pledges.</p> <p>You never clean up after yourself. You just go around and destroy things. You are disrespectful to the people, culture and land. You desecrate burials and areas held sacred.</p>	Please see General Response 1.

**Responses to Second Draft EIS Comments**

<b>Commenter</b>	<b>Submitted By</b>	<b>Comment</b>	<b>Response</b>
		Like, who wants people like that in their house?	
Jonah Yee		Please, no more destruction. No more desecration of our fragile island ecosystem.	Please see General Response 1.
Sandy Yee		the Cultural Impact Assessment (CIA) in the new draft is deficient because it removed approx. 900 pages of informant testimony and analysis (Compare the CIA in the First DEIS vol 2 with Second DEIS vol 3).	The first draft CIA was revised to improve readability, focus analysis within the project area and broad geographical area, and add information from new survey respondents and interviews. No information provided by the interviewee and survey respondents was removed from the DEIS CIA.
Sandy Yee		The archaeological survey was not fully completed, so that is deficient.	Section 3.4.4.6 discusses the Army's CRM Program at PTA, including the State-owned land. Previous archaeological surveys are provided in Table 3-14 of the EIS. Section 3.4.4.3 discusses why portions of State-owned land have not been surveyed.
Sandy Yee		And the wildfire analysis is deficient (the Federal firefighters at PTA are not trained or equipped for wildfire; they do airport fires).	In accordance with DoD Instruction 6055.06, DoD Fire and Emergency Services Program, and the PTA Integrated Wildland Fire Management Plan, PTA firefighters respond to all fires on PTA lands and within the Army's Area of Responsibility. Per the Memorandum of Agreement between the Army and the Hawai'i County Fire Department, signed December 22, 2014, the Army is the primary responder to all fires within the PTA Area of Responsibility, which includes all areas within 25 road miles from the PTA boundary. PTA personnel implement procedures for prevention and suppression of all fires, including wildfires, in accordance with the Integrated Wildland Fire Management Plan. Mitigation measures the Army proposes include (1) negotiation of an agreement with the State to monitor wildfires on land not retained and (2) implementation of additional thermal technology. These mitigation measures have been added to the Mitigation Measures subsection. Section 3.16.4 was revised with additional information regarding PTA's fire department responsibilities.
Miles Yoshioka	Hawaii Island Chamber of Commerce	Aloha and good evening. Aloha and good evening, everyone. My name is Miles Yoshioka. I represent the members of the Hawaii Island Chamber of Commerce. Our organization fully supports the US military's training mission at Pohakuloa Training Area. Our organization	Please see General Response 1.

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>represents over 330 member businesses, nonprofit organizations, and professionals from east away and beyond. Many of our neighbors, family members, and friends in uniform in the Hawaii Army and Air National Guard, US Army Reserves, and Hawaii County Police and fire departments are trained at Pohakuloa. Guardsmen are able to gain critical experience here at home at this premier training facility rather than facing long-term deployments on the mainland. Additionally, PTA Fire and Rescue team members are the first responders on the Saddle Road area, handling emergencies in the first critical minutes, often resulting in saved lives from responding to car accidents, finding lost hunters and hikers to fighting wildfires alongside HFD and state personnel. We are grateful PTA is around. As part of the stewardship of the land, the army manages the preservation of dozens of endangered plants and animals, which includes propagating rare native plants and stocking a seed bank. A team of archeologists manage over 1200 archeological sites with monitoring, preservation, and surveying to find additional areas. Units visiting PTA are briefed on arrival and are required to adhere to natural and cultural restrictions on base and leave the training areas clean after each exercise. The military boosts our local economy through military contracts with Hawaii Island-based companies, community services and support for nonprofits and patronage of our local businesses. A large majority of the personnel who work at PTA year-round are civilians who live in our communities like Waimea, Waikoloa, Hilo, or Puna. A few years back, I had the opportunity to visit a live training exercise out in the field at PTA. Our group was briefed by a young man, a captain who was about my own kids' age. He was responsible for leading a company and I remember being impressed by how dedicated he was to the safety and wellbeing of his soldiers. I remember getting a little emotional as I put myself in this officer's parents' shoes and thinking how much they would want their kid to get the best training and experience he can get under the most lifelike battle conditions in a location that has the climate and terrain he</p>	

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>may have -- have to face in battle. All this so he is best prepared to deal with whatever challenges come his way and then be able to bring his soldiers and himself back home to his families. Okay. Thank you very much.</p>	
Katrina Zavalney		<p>Please stop Army Training land Retention at Pohakuloa Training Area (PTA) and give the land back to native Hawaiians. Mahalo</p>	<p>Please see General Response 1.</p>
David Zierott		<p>I attended college in Hawaii at Hilo College in the 1970's and now visit Hawaii at least once a year to visit my daughter and grandchildren. During my college years, I learned marine biology but also learned of another culture different from my own, the Hawaiian culture. I hiked the hills of the Mauna Kea and Mauna Loa volcanos, both for their beauty and their bounty (wild pigs). Very special places they are. There now is public discourse on the continued use of these island lands for military training. I think that we should look toward preserving the land. These islands of Hawaii are a beautiful resource and took millions of years to form. In my memory there are the images of the past bombing runs and artillery training on the island of Koho'olawe. Huge clouds of dust rose into the air after bomb explosions. It drifted off and was lost in the sea. That dust took millions of years to form and was part of these Hawaiian islands which are precious, lush dots in the middle of the Pacific ocean.. I agree that Hawaii is a strategic military location and it is vital to the security of the United States. But the focus of our military now, in Hawaii, should be preservation and where needed, restoration. Western culture damaged the culture and lives of the Hawaiian people. I believe that, as a nation, the United States has evolved to be more empathetic to the lives and cultures not entirely like our own. Let us now, as the United States, make a statement toward preservation. Our fighting forces are the best in the world. We can train them on other land so that we preserve the beauty and treasure that is Hawaii. Thank you, David Zierott Minnesota 651-XXX-XXXX [phone number redacted]</p>	<p>Please see General Response 1.</p>
David Zierott		<p>Dear Matthew, I attended college in Hawaii at Hilo College in the 1970's and now visit Hawaii at least once a year to visit my daughter and grandchildren. During my college</p>	<p>Please see General Response 1.</p>

**Responses to Second Draft EIS Comments**

Commenter	Submitted By	Comment	Response
		<p>years, I learned marine biology but also learned of another culture different from my own, the Hawaiian culture. I hiked the hills of the Mauna Kea and Mauna Loa volcanos, both for their beauty and their bounty (wild pigs). Very special places they are. There now is public discourse on the continued use of these island lands for military training. I think that we should look toward preserving the land. These islands of Hawaii are a beautiful resource and took millions of years to form. In my memory there are the images of the past bombing runs and artillery training on the island of Koho'olawe. Huge clouds of dust rose into the air after bomb explosions. It drifted off and was lost in the sea. That dust took millions of years to form and was part of these Hawaiian islands which are precious, lush dots in the middle of the Pacific ocean.. I agree that Hawaii is a strategic military location and it is vital to the security of the United States. But the focus of our military now, in Hawaii, should be preservation and where needed, restoration. Western culture damaged the culture and lives of the Hawaiian people. I believe that, as a nation, the United States has evolved to be more empathetic to the lives and cultures not entirely like our own. Let us now, as the United States, make a statement toward preservation. Our fighting forces are the best in the world. We can train them on other land so that we preserve the beauty and treasure that is Hawaii. Thank you, David Zierott</p>	
Tiffany Zygutis		Please get Military off the Hawaiian lands! Mahalo and Aloha. Tiffany Zygutis.	Please see General Response 1.

## **Form Letter Submitted on Second Draft Environmental Impact Statement, Army Training Land Retention at Pōhakuloa Training Area**

### **Form Letter 1:**

To whom it may concern: As a person who loves Hawai'i and her people, I am firmly opposed to the Army's retention of any of the "State" lands at Pōhakuloa. I support the "No Action Alternative" that would allow the lease to expire and require the Army to comply with all lease terms that include the clean-up of these lands. The other alternatives preserve a status quo in which Hawaiian land is bombed, burned, littered and polluted. The status quo is precisely what needs to be changed. Scores of concerned citizens have taken time to express to you the impact of the long-term occupation of these lands and the presence of the US military in our islands.

Your study should follow the parameters set by true experts on the impacts of your proposal. Our comments have raised the impacts of the occupation of these parcels, spanning time and space, and your EIS should follow suit. You should evaluate historical harms that would continue should you retain these lands. You should also evaluate the growing cumulative impact that would compound should you continue misusing these lands. Alternative futures that your retention of these lands would foreclose should also be considered.

Please add to the "Alternatives" section: 1) Diplomacy with those the military perceives as potentially requiring a combat response and disclosing disputes for civil remediation. This would eliminate the need for combat mission training exercises in places like Pōhakuloa. 2) Reprioritization of food security and resilient communities as a counterattack strategy. Rather than meet an attack in the theater of U.S. Pacific operations through armed forces, a counter-measure would focus on rebuilding the capacity of communities to rebuild and sustain themselves. This alternative would meet purpose and need through the long term goal of securing Hawai'i against the depredations of state enemies. 3) Retention of lands to ensure appropriate stewardship and ecological preservation, including wildlife fighting capacity, for the duration of a planning period for transition to a public land trust and/or organizations or associations of communities that will properly steward the land.

This would augment your "No Action" alternative and allow for immediate questions of landowner liability to be addressed to the U.S. military. The Army should take a hard look at alternatives to live fire training, including those that haven't been examined since 2017 according to your Draft Environmental Impact Statement (DEIS). Instead of insisting on the current path of retaining these lands, switch gears and genuinely engage the community on a clean-up plan that sets us on a path to return these lands to those who love them. This return of 'āina is long overdue. The time is now to give the #landback. Sincerely,

### **Response to Form Letter 1:**

Please see **Sections 3.3, 3.5, 3.4, 3.11, and 4.0** of the EIS for information on biological resources, hazardous substances and hazardous wastes, cultural resources, environmental justice, and cumulative impacts, respectively.

**Section 2.1.4** details the established screening criteria used to identify the range of potential alternatives that support the purpose and need of the Proposed Action (discussed in **Section 1.3**). The Army used the screening criteria to assess whether each alternative was reasonable and would be carried forward for evaluation in the EIS.

The EIS discusses the potential for the Proposed Action to foreclose future options in **Sections 3.2.6, 3.4.6, 3.11.6, and 5.6**.

#### **Form Letter 1: List of Submittals**

abdo, ayah	Brande, Kaili	Douglas, Bob
Adams, Meleanaonālani	brinkerhoff, zero	Dudley, Melanie
Addleman, Candace	Brody, Jocelyn	Dulan, Kiana
Agard, Joie	Brown, Clementine	Dwight, Jennifer
Akhter, Rabayah	Burgess, Joel	Elmorw, Gerard
Akiona, Partner	Burnett, Gauge	Enomoto, Sheridan Noelani
Akiyama, Kara	Burwell, Martha	Esaki-Kua, Lauren
Alapai, Stacey	Carne, Violet	Espinoza, Lenni
Albano, Donovan Kamakanimaikalani	Carver, Lena	Espinoza, Lennie
Albertini, Jim	Castillo, Aria	Estavillo, Mychel
Alexander, Jason	Chang, Katherine	Farrow, Cori
Allison, Katherine	Cho, AJ	Ferguson, Shiloh
Angell, JL	Choe, Seb	Fisher, Leina
Applewhite, Anela	Chun, Barryn	Fisher, Lilly
Aquino, Tracey	Clapp, Ed	Fitzgibbons, Sara
Archer, Bretton	Clark, Kristin	Flores, Kapulei
Arnold, Carl	Cogdill, Caitlin	Fong, Breanne
Aruanno, Gina	Costa, Shalom	Francke, Kathrin
Asano, Corey	Coules, Alexa	Frazier, Leialoha
Au, Francesca	Cravalho, John	Frazier, Makahanaloa
Aynessazian, Tanya	Cravalho, Patricia	Frazier, Nicholas
Bacchilega, Cristina	Cristobal, Nikki	Frazier, Piimauna
Baker, Kelsey	Cua, Alysa	Freitas, Cindy
Bandsma, Christine	Dadzie, Liam	Fsrdeen, Mina
Baravilala, Akalaini	de Angelis, Kainoa	Fung, Keala
Barker, Rebecca	DeBiasi, Natalie	FUTRELL, sHERRILL
Barros, River	DeLeon, Earl	Ganzelli, Brittney
Bender, Susan	DeMaria, Robert	Gehlbach-Wilson, Nicole
Bennett, Anna	Dodge, Alyce	Gibson, Golden
Binkerhoff, Zero	Dodge, Vincent	Grace, Sherilyn
Blair, Patricia	Dolan-Ma, Thomas Kevin Kekoa	Grandinetti, Jocelyn
Blake, Marissa	Dolena, Syliva	Greer, Ava
Block, Yvonne	Dolena, Sylvia	Grion Filho, Douglas
Bobilin, P Noel	Dorsey, Ann	Guerreiro, Jowell
Bodin, Jessica	Dougherty, David	Guerrero, Clarisa

Hadlock, Jennifer  
Hall, Ryler  
Han, Joseph  
Hanakahi, Kaipo  
Hanohano, Kalai  
Harold, Pualei  
Helms, Kat  
Hewitt, Stephan  
High, Kaliko  
Ho, Brittany  
Hodak, Hanna  
Hofer, Fred  
Hollingsworth, Piper  
Holmes, Satsu  
Hololio Johnson, Candi  
Holton, Janet  
Hulsemann, Chloe  
Huynh, Ly  
Ikehara, Sam  
Ioprinzi, Clare  
Iverson, Kelly  
Jackson, Mariko  
jay, jonathan  
Ji, Hana-Lei  
Jong, Janice  
Kalei, Heather  
Kali, Caryn  
Kali, Lianna  
Kalili, Momi  
Kalo, Karen  
Kanae, Leah  
Kanaha, Kiane  
Kang, Julia  
Kanui, Makaiwa  
Karides, Marina  
Kasulka, Hannah  
Kawakami, Paige Ka'ohu  
Kawela Kim, Lindsey  
Kealoha, Kamahana  
Kekaua, Keala  
Kekaula, Merania  
Kelai, Kiana  
Keller, Kahilo  
Kennedy-Natividad, Jamen

Kline, Jennifer  
Kohatsu, Tatsuki  
Kosoris, Shauna  
Kubo, Zachary  
Labaun, Alexa  
Lanto, Melissa  
Lanuza, Dr., Kalena  
Lanuza, Kalena  
Lanzilotti, Leilehua  
LaPenna, Ellen  
Larsen, Autumn  
Larsen, Shari  
Laus, Ludovic  
Lazar, Bill  
Lazar, William  
Lazarou, Eleni  
Lazarus, Eunice  
Leatherman, Marissa  
Lee, Camellia  
Lee, Jennifer  
Leong, Eri  
Lewark, Rae  
Lichty, Pamela  
Like, Raelene  
Lilly, Ama  
Lim, Amaya  
Lindenmann, Noelle  
Linder, Patty  
Lindstrom, John  
Littlejohn, Ka'inani  
Lo, Nanea  
Lockhart, Leslie  
Loeffler, Maddie  
Longoria Garcia, Madeleine  
Lopes, Sheena  
Ioprinzi, Clare  
Lucas, Richard  
Luu, Tracy  
Mahone, Kahelelani  
Manshel, Hannah  
Marchitti, Danielle Noelani  
Marsh, Amy  
Martin, Martha  
Martin, Nate

Martinez, Krystal  
Martins De Souza, Sarah  
Matson, Shannon  
Matsunaga, Hannah  
Mattos, Rebecca  
Maui, Indie  
Maunupau, Kuuleinani  
Maxera, Leilani  
McClintock, B. A.  
McDuff, Kathy  
McGrath, Deborah  
Merrill, Kainani  
Mickelson, Jennifer  
Miller, Dana  
Ming Wei, Koh  
Monarrez, Marina  
Monasi, Mariana  
Morey, Sandra  
Muneoka, Shelley  
Nakasone, Kalena  
Naniola, Kauikeolani  
Narvaez, Skye  
Neves, Kelsie  
Newman, Sharon  
Newton, Melissa  
Noelani, Sheridan  
North, Leslie  
Nurphy, Ariel  
O'Connor, Moriel  
Oshiro, Kayla  
Overley, Chromium-Crysoberyl  
Oxman, Graham  
Pablo-Cook, Hurao  
Paisner, Miriam  
Pajunen, Taylor  
Pang, Meilani  
Parker, Manuokalewa  
Patterson, Ariel  
Perez Urbina, Alexandra  
Pilger, Dylan  
Pillard, Julia  
Pohaikealoha Au, Sharla  
Potenciano, Sofia  
Potter, Holly

Powell, Amber  
Pritchett, Sarah  
Puchalski, Alisha  
Quiamno, Sage  
Quinto, Stephanie  
R, Venice  
Ramos, Dylan  
Rdechcor, Levona  
Reeves, Makana  
Rengiil, Elilai  
Reynolds, Mia  
Rivera Palacio, Luana  
Rivera, Milagros  
RobertsEmery, Susan  
Rochon, Gabrielle  
Rodgers, K  
Rohrer, Judy  
Rojas, Tara  
Roman, Susana  
Rudolph, Shannon  
Ryan, Anela  
Saastamoinen, Sara Maaria  
Saffery, Alexandra  
Sanders, Ashley  
Scarola, Miranda  
Scott, Robert  
Secretario, James  
Shaw, Noel  
Sigmon, Clara  
Sims, Lisa  
Sonnemaker, Tyler  
Spielman, Aaron  
Stibbard, Melissa  
Stone, Mary  
Stovall, Lauren  
Stratten, Ann  
Sudlow, Yvonne  
Suzuki, Stefanie  
Swannell, Philippa  
Swasen, Mitchell  
Tachera, Naomi  
Thayer, Jodie  
Theriault, Crystal  
Theys, Asher

Tourlousse, Ellen  
Tupou, Wailea  
Tupou, Waileia  
Turner, Mālie  
Tyler, Lauren  
Usborne, Isis  
Vickery, Susan  
Wagner, Jolie  
Wahilani, Kaukaohu  
Walker, Keke  
Walker, Maria  
Wanger, Jolie  
Warech, Julie  
Warrington, Hedwig  
Watson, Harold  
Weber, Simone  
Wei Koh, Ming  
Weir, Ka'ōpu'uokahā  
Whitaker, Al  
White, Ethan  
Wirth-Petrik, Brittney  
wolf-eichbaum, dorothea  
WOLSTEIN, ASHLEY  
Worawongwasu, Aree  
Workman, Janice  
Worley, Robin  
Yogi, Bean  
Young, Kristen  
Yuen, Mia  
z, celia  
Zacher, Keri  
zulueta, Jacinto  
  
Hawai'i Alliance for Progressive Action  
Jewish Voice for Peace

## **Form Letter Submitted on Second Draft Environmental Impact Statement, Army Training Land Retention at Pōhakuloa Training Area**

### **Form Letter 2:**

Aloha, my name is \_\_\_\_\_ and I am from \_\_\_\_\_. I am writing in opposition to the Army's Proposed Action to continue their retention of approximately 22,750 acres of State-leased lands once the lease expires in 2029, either through a new lease or through purchase. I am in full support of the No Action Alternative, under which the State lands will be relinquished back to the State. Below, I outline several key points of concern pertaining to various sections in the draft EIS.

**3.3 Biological Resources:** On July 20th, 2022, the Army inadvertently started a fire in the Impact Area. This fire, referred to as the Leilani Fire, spread across 17,712 acres. 12,458 of these acres were outside of PTA and included about half of the remaining forest of the Pu'u Anahulu Game Management Area. The remaining 5,254 acres (which includes 2,880 acres of State-owned land) encompassed threatened and endangered species habitat areas within the training area. As described in the EIS, post-fire assessment determined a net decline of four endangered plant species, as well as destruction to potential habitat of 'ōpe'ape'a (Hawaiian hoary bat, *Aeorestes semotus*). It is important to note that this fire surpassed both annual and cumulative allowances for authorized incidental take of 'ōpe'ape'a roosting habitat. This fire is one of many that the Army has caused over the years, with an average of 37 fires occurring at PTA annually. These fires result in catastrophic damage to our native flora and fauna and threaten the safety of human communities. Within the ~22,750 acres of State-owned land reside numerous endemic and indigenous plants and animals. Some of these species are only found within the Pōhakuloa region and are critically endangered. The landscape of Pōhakuloa is a unique region that once consisted of even more lifeforms than what we see today. As long as the Army retains control of the State-owned lands, native species are under threat of continued mismanagement and negligence. All of PTA is classified as conservation district under the State's 1961 Land Use Law. It would therefore stand to reason that a future lease agreement or purchase from the State would be unlawful, since military activity on conservation land is not legal.

**3.4 Historic and Cultural Resources and Cultural Practices:** It is important to note that the entirety of the Pōhakuloa region is a culturally significant entity. This landscape holds importance as a region long utilized by Kānaka 'Ōiwi for the acquisition of natural resources, for ceremonial conduct, and for safe passage between various moku and ahupua'a, among other activities. Were it not for Army occupation, this 'āina would still be enjoyed as a safe locale to conduct cultural practices. Dozens of archaeological sites exist within the State-owned lands. Like the biological organisms mentioned above, these features are at risk from continued Army activities.

**3.5 Hazardous Substances and Hazardous Wastes:** Numerous metals and chemicals are listed in 3.5.4.3, such as lead, copper, and antimony. The BAX V-10 was constructed only 13 years ago and already contains dangerous levels of these metals. I worry that these will break down over time and make their way downslope as airborne particulates, or infiltrate our watershed. It is also admitted that future cleanup efforts may include "emerging contaminants" that are as yet unknown, which is unsettling. Throughout the EIS, there are inconsistencies in reference to cleanup of the State-leased lands. In some sections of the

EIS, cleanup (and even reforestation) are written about as a matter-of-fact action; in others, cleanup is referred to in less certain terms. This is concerning, as cleanup should be a top priority.

**3.6 Air Quality and Greenhouse Gases and 3.8 Geology, Topography, and Soils:** Communities adjacent to and downwind from PTA are concerned about airborne contaminants, as per the previous section. Additionally, continued military activity and detrimental effects due to wildfires contribute to the exposure of soils, leading to erosion. During windy days, dirt is kicked up and carried miles from its source point, leading to poor air quality and unhealthy conditions.

**3.9 Water Resources:** The Pōhakuloa region is a vital watershed. As stated in the draft EIS, "the uniqueness [of this groundwater] is 'irreplaceable'; and the vulnerability to contamination is classified as 'High.'" Given the potential pollutants listed in section 3.5, I am concerned that these and other pollutants could infiltrate the aquifer. While the groundwater at Pōhakuloa is not directly consumed, all water within our porous, volcanic island is interconnected, eventually reaching water sources that are consumed as well as flowing out to the sea. Lead is a particular concern, as no amount of lead is safe for biological consumption. As stated in section 3.5, "Lead is the primary COC from small caliber munitions." The draft EIS further states that the use of military munitions pose a potential threat to soil and groundwater quality. The draft EIS mentions that soldiers are required to collect spent casings, but bullet casings are known to litter the landscape.

**3.11 Environmental Justice:** If the Army is serious about involving people in having agency over the decision-making process, then they need to listen to voices saying they need to vacate this land. As stated in the EIS "... generations of Hawaiians [are] experiencing military culture and land uses that do not align with traditional cultural values." It does not matter how much discourse the Army engages in with the public, or how much money is put towards natural resource management; at the end of the day, the Army is an instrument of war, and training activities will result in future damages regardless of so-called mitigation efforts. There is no justice to be found when 'āina is treated with such carelessness.

**3.16 Human Health and Safety:** I am concerned about health impacts due to Army activity. UXO remain a threat both within the State-leased lands and elsewhere. Contaminants, poor air quality, and wildfires mentioned previously all have the potential to cause serious health issues within our communities. There is no clear evidence suggesting that Army activity is having no negative impact on human health. Concluding Thoughts In conclusion, I support the No Action Alternative by which the State-leased lands will return to the State in 2029. Throughout the second draft EIS, it is made abundantly clear that the No Action Alternative consistently results in significant, beneficial impacts, as opposed to the numerous adverse impacts that would result from Alternative 1. The Army has mistreated the lands of Pōhakuloa, threatening human health and the health of our greater environment. The Army needs to clean up the State-leased lands and return them in better condition. I implore the State to not consider re-leasing these lands or selling these lands to the Army in the future. Mahalo for your time.

## **Response to Form Letter 2:**

Thank you for sharing your concerns. The Army understands its responsibilities for proper stewardship of the land and has the utmost respect for Native Hawaiians and all residents of Hawai'i. Please find below responses to the comments provided in the submitted form letter.

**Section 3.3, Biological Resources: Section 3.3.4 and Volume III, Appendix K** have been updated with more recent scientific data and surveys and wildland fire analysis in **Section 3.3.6** has been revised. Mitigation measures for invertebrate and vegetation studies, and additional ungulate fencing have been added to the Proposed Mitigation Measures subsection.

In compliance with the 2003 Biological Opinion, Leilani fire impacts were reported to USFWS in May 2023 with additional information provided to USFWS in October 2023 and April 2024. As of this publication there has been no USFWS response to either letter. Additional information has been added to **Section 3.3.4.1** regarding re-initiation of consultation as a part of the draft Programmatic Biological Assessment, for which consultation with USFWS is anticipated to be completed by end of fiscal year 2025. **Section 3.3.4** has been updated with more recent scientific data and surveys, and wildland fire analysis in **Section 3.3.6** has been revised. Mitigation measures for installation-wide invertebrate and vegetation studies, additional ungulate fencing, and restoration of ungulate impacted areas have been added to the Proposed Mitigation Measures subsection.

Additionally, Compliance with HAR Chapter 13-5, Conservation District, has been revised and is discussed in **Sections 1.4.2, 3.2, and 5.3.2**. These revisions make clear that for analysis purposes, the EIS assumes BLNR would establish a special subzone in the conservation district that allows for military training use.

**Section 3.4, Historic and Cultural Resources and Cultural Practices: Section 3.4.4.6**, Existing Management Measures, describes the Army's Cultural Resource Management Program (CRM) at PTA. This includes the existing SOPs and management measures guided by the 2018 Integrated Cultural Resources Management Plan and the 2018 Section 106 PA.

**Section 3.4.6** details that there would be less than significant adverse impacts to historic and cultural resources under lease and fee simple title due to continued long-term, moderate, beneficial impacts on historic and cultural resources from the continuation of CRM programs and actions that preserve and protect historic and cultural resources.

**Sections 3.2.6 and 3.11.6** recognize that the alienation of land granted to the State under Section 5(f) of the Admission Act (i.e. ceded lands) represents a significant adverse impact.

**Section 3.5, Hazardous Substances and Hazardous Wastes:** The Army is committed to understanding better and acting earlier to manage risks from emerging contaminants, and will continue to serve as a member of Materials of Evolving Regulatory Interest Team (MERIT) and continue collaborating to identify and develop mitigation measures for emerging contaminants.

The current status of management and cleanup of hazardous substances and hazardous wastes is discussed in **Section 3.5**. In accordance with the lease and under the provisions of existing law, the Army retains responsibility for cleanup and restoration of former training areas. After the lease expires, if

deemed necessary, the Army would follow Army regulations to determine how and when the cleanup and restoration of State-owned land not retained would occur, following the CERCLA process.

Through the Army Compatible Use Buffer/Readiness and Environmental Protection Integration program, the Army works with various eligible entities (State conservation departments, universities, watershed protection organizations, land trusts, and other non-profit conservation-minded organizations) to enact a holistic encroachment management strategy that aims to prevent additional incompatible development, conserve native forests/habitat for threatened and endangered species, and bolster climate resilience adaptation and responsiveness.

The current status of management and cleanup of hazardous substances and hazardous wastes is discussed in Section 3.5. In accordance with the lease and under the provisions of existing law, the Army retains responsibility for cleanup and restoration of former training areas. After the lease expires, if deemed necessary, the Army would follow Army regulations to determine how and when the cleanup and restoration of State-owned land not retained would occur, following the CERCLA process.

**Section 3.6, Air Quality and Greenhouse Gases: Sections 3.6.4 and 3.6.6** provide information on PTA management of fugitive dust via 1) erosion control and stabilization techniques (revegetation, erosion control structures, site hardening, dust palliatives) under the Land Rehabilitation and Maintenance component of the Integrated Training Management Program (USAG-HI & USARPAC, 2013), 2) adherence to Unified Facilities Criteria 3-250-09FA, Aggregate Surfaced Roads and Airfields Areas, which has dust control requirements for aggregate surfaced roads and airstrips of airfields at Army installations, and 3) best management practices such as maintenance of roads and training trails, maintenance of vegetative cover, periodic application of water to control dust, and modifying training during high risk conditions. Integrated Training Management Program Land Rehabilitation and Maintenance project BMPs are assessed annually during Range and Training Land Assessment reviews (U.S. Army Hawaii Range Division, 2022)."

**Section 3.8, Geology, Topography, and Soils: Section 3.8.4.4** of the EIS documents the existing management measures utilized by the Army to protect and ensure the minimization of impacts on soil resources from and associated with training, including preventative measures and established procedures for the suppression and control of wildfires (USAG-PTA, 2019).

**Section 3.9, Water Resources:** The best available scientific data for groundwater and surface water quality was incorporated into this EIS. Groundwater and surface water quality are discussed in **Section 3.9** of the EIS. **Section 3.9.4.6** of the EIS documents the existing management measures utilized by the Army to protect water resources. The State Department of Health (DOH) Safe Drinking Water Branch (SDWB) monitors groundwater quality of aquifers as described in **Section 3.9**. SDWB has released groundwater contamination maps for Hawai'i Island that show most contamination is along the eastern coast of the island. You can learn more directly from the source cited in this section, the DOH SDWB Environmental Health Portal at <https://eha-cloud.doh.hawaii.gov/sdwb/#!/home>

**Section 3.5, Hazardous Substances and Hazardous Wastes** presents the existing conditions from current activities at PTA and notes that risk of contaminants mobilizing is not a concern as limited surface water

and groundwater pathways on State-owned land pose minor potential impact to soil and groundwater quality.

**Section 3.11, Environmental Justice:** Discussion on the impacts on communities with environmental justice concerns from the Army's historical and current presence and mission activities is provided in Section 3.11.16.

**Section 3.16, Human Health and Safety:** As discussed throughout the EIS and particularly in Sections 3.5 and 3.16, the Army training activities at PTA have inherent safety risks associated with them that include, but are not limited to, presence of and exposure to hazardous materials, aircraft mishap potential, exposure to air pollutants, wildland fires, and noise. As described throughout the EIS, health and safety hazards are managed through adherence to federal and DoD regulations, safety programs, and standard operating procedures. The Proposed Action would not introduce new safety hazards; however, under Alternative 3 and the No Action Alternative, the presence of safety hazards would be reduced compared to existing conditions from cessation of training activities on State-owned land not retained.

#### **Form Letter 2: List of Submittals**

Ahn, Wai'ala	Sakamoto, Mary
Altemus-Williams, Imani	Sarasa, Emily
Aynessazian, Tanya	Scarola, Miranda
Bailey, Heather	Staudenmaier, Anna
Bellwood, Miriam	Stormcrow, Kaleiheana
Burnham Larish, Linda	Tokuda, Tlaloc
Caron, Will	Trasport, James
DeGregorio, Cory	Usborne, Isis
Elovitz, Rose	van Bergeijk, Meghan
Folino, Melanie	Ware, Diane
Giardina, Sonja	Warech, Julie
Girbino, Vi	Weisenborn, Kim
Greenwell Hummel, Lisa	
Hartman, Christina	
Hartmann, Hannah	
Hofer, Fred	
Kama, Kaulilinoe	
Kelly, Spencer	
Kunitake, Caroline	
Larish, Malielani	
Lee, April	
McGuire, Ashlie	
Morinoue, Maki	
Osorio, Dr., Jamaica	
Peck, Sam	
Pond, Jason	
Roney, Deirdre	



**NEPA and Other  
Environmental Planning Documents  
and Existing Management Measures**



## Appendix E

# NEPA AND OTHER ENVIRONMENTAL PLANNING DOCUMENTS AND EXISTING MANAGEMENT MEASURES

The Army has developed a number of National Environmental Policy Act (NEPA) documents; Biological Opinions; Memorandums of Understanding; environmental planning, compliance, and conservation documents; and standard operating procedures (SOPs) for its ongoing activities within the State-owned land at Pōhākuloa Training Area (PTA). Some of these documents are for all of PTA or all of U.S. Army Hawaii, and thus, cover activities beyond the State-owned land. This appendix lists 1) NEPA documents (Environmental Assessments and Environmental Impact Statements) and associated management measures; 2) Biological Opinions and Memorandums of Understanding and associated mitigation measures; 3) environmental planning, compliance, and conservation documents and associated best management practices (BMPs), SOPs, and management measures; and 4) SOPs the Army follows to minimize the environmental and socioeconomic impacts of its ongoing activities within the State-owned land.

PTA's environmental planning, compliance, and conservation documents; BMPs; SOPs; and management measures are periodically updated. This appendix reflects the versions of these documents, BMPs, SOPs, and management measures at the time of publication of the EIS. The Army also adheres to federal, state, and Army regulations, which are described in the EIS.

## E.1 NEPA Documents and Associated Management Measures

**Table E-1** lists the available Environmental Assessments and Environmental Impact Statements by the Army and other agencies for construction and use of training facilities and infrastructure within the State-owned land. In accordance with Hawai'i Administrative Rules Section 11-200.1-24(d)(7), **Table E-1** does not include NEPA analysis conducted via categorical exclusion; however, **Table E-1** does include NEPA analysis documented via Record of Environmental Consideration, which is required for certain categorical exclusions or actions covered by existing or previous NEPA documentation (32 Code of Federal Regulations 651.19). Additionally, in some cases construction and use of the training facilities and infrastructure predates the lease, predates NEPA regulations, or the NEPA documents have been lost over time; therefore, NEPA documents are not available for these situations.

<b>Table E-1: Facilities and Infrastructure Within State-owned Land</b>		
<b>Facility/Infrastructure</b>	<b>Description</b>	<b>NEPA Document</b>
Battle Area Complex	Digital live-fire range for mounted, dismounted, and aviation training	Environmental Impact Statement: Transformation of the 2nd Brigade, 25th Infantry Division (L) to a Stryker Brigade Combat Team in Hawaii, 2004
Military Operations on Urban Terrain	Range with several buildings to simulate a village for practicing military operations in an urban setting	Environmental Assessment: Development and Use of Military Training Facilities on Pohakuloa Training Area, Hawaii, 2009
Ammunition Supply Point	Facility where ammunition is securely stored for issue to and return by military units	Environmental Impact Statement: Transformation of the 2nd Brigade, 25th Infantry Division (L) to a Stryker Brigade Combat Team in Hawaii, 2004 Record of Environmental Consideration Unnumbered, July 14, 2014
Ammunition Holding Area	Area where ammunition is temporarily stored while a military unit is training	Environmental Impact Statement: Transformation of the 2nd Brigade, 25th Infantry Division (L) to a Stryker Brigade Combat Team in Hawaii, 2004 Record of Environmental Consideration 938, July 5, 2006 Record of Environmental Consideration 944, July 5, 2006
Cooper Air Strip	UAV airfield with storage buildings	Record of Environmental Consideration 2700, Aug 19, 2010 Record of Environmental Consideration Unnumbered, December 10, 2009
Firing Point	Location used for live-fire and non-live-fire training by indirect-fire weapons (i.e., artillery, mortars, and rockets)	Environmental Impact Statement: Transformation of the 2nd Brigade, 25th Infantry Division (L) to a Stryker Brigade Combat Team in Hawaii, 2004 Record of Environmental Consideration 4522, March 13, 2019 Record of Environmental Consideration 4527, September 13, 2019 Record of Environmental Consideration 4528, October 21, 2019 Record of Environmental Consideration 4534, August 4, 2020 Record of Environmental Consideration 4610, April 30, 2020
Portion of Range 14 in Training Area 9	Multi-purpose live-fire range	Environmental Impact Statement: Transformation of the 2nd Brigade, 25th

<b>Table E-1: Facilities and Infrastructure Within State-owned Land</b>		
<b>Facility/Infrastructure</b>	<b>Description</b>	<b>NEPA Document</b>
		Infantry Division (L) to a Stryker Brigade Combat Team in Hawaii, 2004
Landing Zone	Cleared area for landing and takeoff of helicopters and tilt-rotor aircraft	Environmental Impact Statement: Basing of MV-22 and H-1 Aircraft in Support of III MEF Elements in Hawaii, 2012
Drop Zone	Cleared area used to drop equipment and personnel via parachute from aircraft	Not available
Forward Arming and Refueling Point	Cleared area with concrete pads for providing fuel and ordnance to helicopters and tilt-rotor aircraft	Environmental Impact Statement: Basing of MV-22 and H-1 Aircraft in Support of III MEF Elements in Hawaii, 2012
Forward Operating Base	Entry-controlled position used to support a strategic goal or objective (e.g., medical facilities, airfields, and maintenance support facilities)	Environmental Assessment: Development and Use of Military Training Facilities on Pohakuloa Training Area, Hawaii, 2009
Helicopter Dip Tank	Surface water feature where helicopters can fill buckets with water during firefighting operations	Programmatic Environmental Assessment: Implementation of the Integrated Wildland Fire Management Plan, 2006 Record of Environmental Consideration Unnumbered, July 24, 2007
Roads and Training Trails		Environmental Impact Statement: Transformation of the 2nd Brigade, 25th Infantry Division (L) to a Stryker Brigade Combat Team in Hawaii, 2004 Programmatic Environmental Assessment: Implementation of the Integrated Wildland Fire Management Plan, 2006 Environmental Assessment: Use of M1117 Armored Security Vehicles at Army Installations in Hawaii, 2008
Firebreaks/Fuel Breaks		Not available
Conservation Fence Units		Programmatic Environmental Assessment: Construction of Large-Scale Fence Units, 2006

## E.2 NEPA Documents and Associated Management Measures

- Environmental Impact Statement: Transformation of the 2nd Brigade, 25th Infantry Division (L) to a Stryker Brigade Combat Team in Hawaii (DA & USACE-POH, 2004).
  - Facilities Covered: BAX, Expand ASP with 3 new ammunition storage facilities, firing points, Ammunition Holding Area, training trails.
  - Training Covered: Mounted, Dismounted, Reconnaissance, Live-Fire (105mm mobile gun system, 120mm mortar, 155mm howitzer, 20 million rounds), Aviation Training.
  - Management Measures (from Table ES-22 of the Environmental Impact Statement):
    - Coordinate with State of Hawai'i Department of Land and Natural Resources to create additional public hunting check in stations.
    - Construct military vehicle trails to conserve existing natural features, including terrain and vegetative cover, to the extent practicable.
    - Where practicable, enhance existing site conditions to help screen the proposed fixed tactical internet tower and support shed from the surrounding area.
    - Implement dust control measures such as dust control chemical applications, washed gravel for surfacing, spraying water, or paving sections of trails to reduce fugitive dust associated with the use of training trails.
    - Establish a minimum 1,000-foot noise buffer around the Waiki'i Ranch property and the Kilohana Girl Scout Camp. Consider training guidelines that minimize nighttime training activities that involve weapons fire or aviation training activities within 2,000 feet of the Waiki'i Ranch and Kilohana Girl Scout Camp.
    - Continue to work with affected communities on noise buffers and potentially adjust the buffer size dependent upon these discussions.
    - Operate a public website that lists a schedule of upcoming U.S. Army Hawaii activities, including training and public involvement projects.
    - Place bollards around wellheads in coordination with utility and property owners to protect structures from potential damage.
    - Minimize or avoid cut slopes, where practicable.
    - Fence or flag where practicable any sensitive plant communities from activities.
    - Use native plants in any new landscaping or planting efforts where practicable.
    - Conduct more intensive surveys of lava tubes identified as potentially supporting native root dependent arthropods. Avoid lava tubes found to contain or support native root dependent arthropods, where practicable. Channel construction and training drainage away from lava tubes where practicable.

- Environmental Impact Statement: Construction and Operation of an Infantry Platoon Battle Course at Pōhakuloa Training Area, Hawai‘i – Volume 1 (USAG-HI & USARPAC, 2013).
  - Facilities Covered: This document does not cover any facilities within the State-owned land but it was added because the management measures for the Hawaiian goose are applicable throughout PTA.
  - Management Measures (from Section 9.1 of the Record of Decision):
    - Enter into a conservation partnership project with the U.S. Fish and Wildlife Service for Hawaiian geese.
    - Mandatory briefs to inform leaders of their responsibility to protect Hawaiian geese.
    - Designate a leader observing range performance during training to ensure Hawaiian geese will not be directly targeted.
    - Cease training if take of a Hawaiian goose is observed and report the take to the U.S. Fish and Wildlife Service.
- Programmatic Environmental Assessment: Construction of Large-Scale Fence Units (USAG-HI, 2006a).
  - Facilities Covered: Fence units.
  - Management Measures (from Finding of No Significant Action and Section 4.0 of the Programmatic Environmental Assessment):
    - PTA Natural Resources Office will survey the proposed fence route prior to fence construction.
    - Flag endangered, threatened, or rare plant areas and reroute the fence to avoid these plants.
    - Limit clearing of ground cover and live vegetation from the fence corridor to no more than 6 feet in vegetated areas.
    - Prohibit cutting of live trees larger than 5 inches in diameter at breast height.
    - Route the fence on barren lava as much as possible to minimize impacts to native vegetation.
    - Route the fence line to avoid, and if possible, include known archaeological sites.
    - Avoid historic properties during fence construction.
    - All historic properties will be marked for avoidance and periodic monitoring will be taken by PTA cultural resources specialists to ensure construction and ground disturbance is limited to the pre-determined locations.
    - Conduct cultural resources pedestrian surveys prior to construction activities.
    - Complete mapping and survey of the lava tubes to determine whether heavy equipment can safely mobilize over the lava tubes.
    - Install a gate (with interpretive signage) to facilitate access to two identified trail sections of site 19528/5006.

- Hunting activities within fenced areas will be coordinated through the Department of the Army police and will include briefing materials in an effort to educate hunters about sensitive cultural resources, restrictions on entering caves and to educate hunters about the effects of depositing mammal remains in cave entrances.
- Open hunting in other areas of PTA to offset the loss of mammal hunting.
- Implement the fuels management program, firebreaks, and weed management program.
- Programmatic Environmental Assessment: Pohakuloa Training Area Real Property Master Plan Adoption, Hawaii Island, Hawaii (USACE-POH & USAG-HI, 2020a).
  - Facilities Covered: None. This document only adopts the Real Property Master Plan. Separate NEPA would occur for Real Property Master Plan projects.
  - Management Measures: None proposed.
- Environmental Assessment: Implementation of the U.S. Army Garrison, Hawaii and U.S. Army Garrison, Pohakuloa Integrated Cultural Resources Management Plans (USAG-HI, 2017c).
  - Facilities Covered: None. This document only adopts the Integrated Cultural Resources Management Plan.
  - Management Measures: None proposed.
- Programmatic Environmental Assessment: Implementation of the Integrated Wildland Fire Management Plan (USAG-HI, 2006b).
  - Facilities Covered: Fire access roads, dip tanks.
  - Management Measures (from Section 4 of the Programmatic Environmental Assessment):
    - Access roads will be constructed with water bars to divert water from the road. In cases where access roads have a drainage ditch, the ditch will include erosion mitigation measures such as silt fences, check-dams, hay bales, or erosion control blankets. Fire access roads constructed on ash soils will be monitored and erosion will be assessed. Application of dust palliatives will be investigated for use to reduce the effects of wind erosion.
    - A burn plan will be completed in advance of ignition and will describe how the prescribed burn will be conducted, and include explanations of responsibilities, equipment support, fire prescription, weather constraints, contingency operations, risk assessment, and safety procedures.
    - Actions to mitigate the effects of exotic species introductions are: 1) thorough cleaning of all construction equipment prior to bringing it to PTA, 2) eradicating plants that are known to be 'invasive' once they have been detected, and 3) utilizing the fire access road maintenance schedule to eradicate non-native plants that have been introduced.
    - Site-specific archaeological surveys will be completed for all fire access roads and fuel management corridors prior to ground disturbance and implementation of fuel management activities. Subsurface surveys of the caves will be conducted to evaluate the potential for damage to the caves from activities occurring on the surface. Should any archaeological site lie in the path of intended construction, the construction path will be altered to the extent necessary to avoid all impacts to the site. Routes may also be altered,

or use of heavy equipment may be limited if subsurface survey data shows caves are susceptible to damage. Archaeological sites will be marked with high visibility flagging. Construction crews will not enter any areas cordoned off with flagging for any reason. Periodic monitoring of all construction projects will take place by cultural resources staff to ensure no cultural resources are impacted. Any discoveries of suspected cultural resources during this project will be immediately brought to the attention of cultural resources staff and the U.S. Army Garrison-Hawai'i Cultural Resource Manager. The Army will conduct a Section 106 consultation with the State Historic Preservation Office and Native Hawaiians in accordance with the National Historic Preservation Act outlining these mitigations. The Army will not proceed with construction activities until the Section 106 consultation is complete.

- Environmental Assessment: Development and Use of Military Training Facilities on Pohakuloa Training Area, Hawaii (USAG-HI, 2009).
  - Facilities Covered: Military Operations on Urban Terrain and Forward Operating Bases Outlaw, 428, and 438.
  - Management Measures (from Finding of No Significant Impact and Section 2.1.2 of the Environmental Assessment):
    - Continue to implement the required measures in the 2003 Biological Opinion and the new requirements from the 2008 Biological Opinion.
    - Complete the PTA Implementation Plan.
    - Construct fencing of entirety of Training Area 21 and perform subsequent ungulate removal.
    - Implement the ongoing and new minimization and conservation measures for nēnē in the vicinity of Range 1 and training activities east of Red Led Trail.
    - Continue implementation of the Integrated Wildland Fire Management Plan.
    - Continue implementation of the conservation measures outlined for reducing the impacts of invasive plants and animals.
    - Avoid endangered plants during construction of access roads and trails.
    - Review all equipment emplacement, construction, and road projects by the PTA Environmental Office to ensure consistency with Biological Opinion requirements.
    - Apply a dust palliative to road surfaces of the proposed training facilities.
    - Avoid construction in known and high probability sensitive natural and cultural resources.
    - Protect federally listed species by following the procedures in the PTA External Standard Operating Procedures.
    - Fence all of Training Area 21 to the east of Red Leg Trail to protect sensitive lava tubes and crevices that provide habitat for *Asplenium peruviana* var. *insulare* or *Silene hawaiiensis*. Remove ungulates from the enclosure.
    - Perform cultural resources pedestrian surveys of all project areas and archaeological monitoring of construction activities.

- Conduct unexploded ordnance inspections prior to road widening, access trail construction, and target emplacement.
- Environmental Impact Statement: Basing of MV-22 and H-1 Aircraft in Support of III MEF Elements in Hawaii (DN, 2012).
  - Facilities Covered: Landing Zones and Forward Arming and Refueling Points.
  - Management Measures (from Record of Decision):
    - Monitor conditions at the landing zones with highest risk for soil erosion. If soil erosion occurs, repair or maintenance the landing zones to reduce soil erosion.
    - Conduct cultural surveys of landing zones and then avoid or mitigate landing zones with cultural resources.
- Environmental Assessment: Use of M1117 Armored Security Vehicles at Army Installations in Hawaii (USAG-HI, 2008).
  - Facilities Covered: Roads, trails, ranges, tactical vehicle maneuver and training areas.
  - Management Measures (from Finding of No Significant Impacts):
    - Construct new energy-efficient facilities.
    - Develop master plans that would reduce vehicle travel.
    - Implement Executive Order 13423 goals to reduce greenhouse gas emissions.
- Programmatic Environmental Assessment: Army 2020 Force Structure Realignment (USAEC, 2013).
  - Management Measures: None proposed.

### **Biological Opinions and MOUs and Associated Mitigation Measures**

- Routine Military Training and Transformation of the 2nd Brigade 25th Infantry Division (Light), Biological Opinion of the U.S. Fish and Wildlife Service (USFWS, 2003).
  - Construction of fence units to minimize threats by feral animals on federally listed plants, and indirectly enhance Hawaiian hoary bat habitat.
  - Institution of training restrictions and requirements including restriction of artillery training to established firing points and ranges, off-road maneuver in designated areas, survey and approval of new field bivouac sites by the PTA Natural Resources Office staff; measures to reduce dust, inspections for invasive species at construction sites, restriction of smoking to particular areas when training and in when training at specific locations (e.g., Palila critical habitat), and reporting all bird and bat strikes.
  - Execute biological studies such as those on the effects of dust on federally listed plants and native habitats; surveys for species presence, abundance, and habitat use by the Hawaiian petrel, Hawaiian hawk, and Hawaiian goose; surveys to determine species abundance and habitat use of the Hawaiian hoary bat; and impact of rodents on *Sophora chrysophylla*.
  - Survey of gulches and gullies in the Ke'āmuku parcel, along with the collection of seed from federally listed species.

- Changes to the Integrated Wildland Fire Management Plan to address the establishment of fire/fuel breaks and fuels monitoring corridors, fire suppression measures, and implementation of the Fire Danger Rating System.
- Invasive plant and animal species control within and adjacent to landing zones, trails, and roadsides; removal of invasive species from vehicles prior to transport; and the implementation of an education program on the consequence of invasive species on installation properties.
- Creation and maintenance of a buffer outside Palila critical habitat Area B to reduce and understand the impacts of Stryker off-road maneuvers.
- Additional Species and New Training Actions at Pohakuloa Training Area, Hawaii, Biological Opinion of the USFWS for Reinitiation of Formal Section Consultation (USFWS, 2008).
  - Annual reporting on Hawaiian goose research, conservation measures, and use of Range 1 (in Impact Area and Training Ranges) as presented in the 2008 biological assessment (USAG-HI, 2008b) and 2008 biological opinion (USFWS, 2008a).
  - Reporting on the application and success of conservation measures for *Silene hawaiiensis*, *Asplenium peruvianum var. insulare*, and *Solanum incompletum* as outlined in the 2003 and 2008 biological opinions and biological assessments.
  - Developing a Hawaiian goose monitoring protocol.
  - Minimizing impacts to the Hawaiian goose from training on PTA.
  - Reporting and transferring dead Hawaiian geese and Hawaiian hoary bats.
  - Removing of barbed wire from fences to protect the Hawaiian hoary bat.
  - Fencing and removing of ungulates from Training Area 21 and fencing to protect *Solanum incompletum*.
- U.S. Army Garrison, Pohakuloa Integrated Natural Resource Management Plan Installation-wide Impacts of Military Training on Hawaiian Geese (*Branta sandvicensis*) at Pohakuloa Training Area, Hawaii (USFWS, 2013).
  - Unit leaders are to be briefed to avoid and minimize impacts and inform troops of their responsibility to protect the Hawaiian goose on PTA, especially when driving and during live-fire exercises.
  - The Army may benefit the Hawaiian goose by funding an off-site project at Hakalau Forest National Wildlife Refuge, as recommended in the 2013 Biological Opinion, in a phased approach as the Refuge allows/permits work to progress. The project may include the construction and maintenance of two 20-acre predator-proof fences as well as personnel (one full-time equivalent) to maintain the fences, control predators, improve vegetation, and encourage the use of the fenced areas by the Hawaiian goose both passively and aggressively. The goal is to produce 21 adults from 26 fledglings per year over a 20-year period starting by year five.

- Memorandum of Understanding (MOU) between the U.S. Department of Defense and the U.S. Fish and Wildlife Service to Promote the Conservation of Migratory Birds. The original MOU expired in 2019; an addendum signed on April 21, 2022, extends the MOU indefinitely or until either party determines the MOU needs to be revised. (DoD & USFWS, 2022).
  - Follow all migratory bird permitting requirements for intentional take under 50 Code of Federal Regulations Sections 21.22, 21.23, 21.26, 21.27, or 21.41.
  - Encourage incorporation of comprehensive migratory bird management objectives into relevant Department of Defense planning documents.
  - Manage military lands and non-military readiness activities in a manner that supports migratory bird conservation, habitat protection, restoration, and enhancement.
  - Inventory and monitor bird populations on Department of Defense lands to the extent feasible to facilitate decisions about the need for, and effectiveness of, conservation efforts work.
  - Work cooperatively with the U.S. Fish and Wildlife Service and state and fish and wildlife agencies to promote timely development, effective review, and revisions of Integrated Natural Resources Management Plans, including any potential revisions to promote the conservation of migratory birds.
  - Incorporate conservation measures addressed in regional or state bird conservation plans in the Integrated Natural Resources Management Plan development process.
  - Allow the U.S. Fish and Wildlife Service and other partners reasonable access to military lands for conducting sampling or survey programs.
  - Support the economic and recreational benefits of bird-related activities by allowing public access to military lands for recreational uses, such as bird watching and other nonconsumptive activities.
  - Develop policies and procedures for facilities design that will promote the conservation of migratory bird populations and habitat.
  - Prior to implementing any activity that has, or is likely to have, a measurable negative effect on migratory bird populations: identify the migratory bird species likely to occur in the area, assess and document, and engage in early planning and scoping with the U.S. Fish and Wildlife Service.
  - Continue to promote the conservation of migratory birds on military lands.
  - Use a best-practices approach for routine maintenance, retrofitting, and management actions to the extent they do not diminish military readiness.

**Environmental Planning, Compliance, and Conservation Documents and Associated Best Management Practices, Standard Operating Procedures, and Management Measures**

- Implementation Plan, Pohakuloa Training Area, Island of Hawaii (USAG-PTA, 2010).
  - Propagation and outplanting management actions.
  - Non-native plant control management actions.
  - Survey protocols for flora and fauna.

- Rodent control management actions.
- Ungulate control management actions.
- Large-scale fencing management actions.
- Invasive invertebrate control management actions.
- Incipient weed program.
- Integrated Natural Resources Management Plan 2019-2023 (USAG-PTA, 2020c).
  - General training restrictions.
  - Hawaiian goose restrictions.
  - Federally listed wildlife restrictions.
  - Palila critical habitat restrictions.
  - Hawaiian hoary bat restrictions.
  - Restrictions in Training Areas 1 through 22.
  - Conservation measures.
  - Plant survey, monitoring, genetic conservation, outplanting, and habitat improvement management actions.
  - Invasive plants management actions.
  - Wildlife management actions.
- Integrated Wildland Fire Management Plan (USAG-PTA, 2021e).
  - Pre-Suppression Actions: risk analysis; ignition prevention; firebreaks, fuel breaks, and fuel management; infrastructure, resources, and supplies; personnel safety; use of prescribed fire; water resources; firefighting training program.
  - Suppression Actions: fire response protocols, special considerations for firefighting on PTA, off-installation deployment.
  - Post-Fire Actions: records and reports, reviews and formal investigations, post-fire analysis.
  - Budget and Implementation.
- Integrated Cultural Resources Management Plan for the U.S. Army Garrison – Pōhakuloa, Hawai'i Island (USAG-PTA, 2018c).
  - SOP 1: Compliance Procedures for National Historic Preservation Act Section 106.
  - SOP 2: Identify and Evaluate Historic Properties.
  - SOP 3: Unanticipated Discovery of Historic Properties and Inadvertent Discovery of Human Remains and/or Cultural Items.
  - SOP 4: Emergency Situations.
  - SOP 5: Native American Graves Protection and Repatriation Act: Planned Activities and Comprehensive Agreements.

- SOP 6: Archaeological Resources Protection Act of 1979 Compliance Process.
- SOP 7: Native Hawaiian Consultation.
- SOP 8: Archaeological Collections Curation and Management.
- SOP 9: Maintenance Procedures for Historic Buildings and Structures.
- Bradshaw Army Airfield Airspace Briefing (USAG-PTA, 2020e).
  - Identifies flight corridors and routes to minimize noise impacts and disruption to the local community.
  - Personnel must fly at 2,000 feet AGL or above during transition to and from PTA airspace, unless low cloud cover necessitates flying lower for safety reasons.
  - Identifies noise sensitive areas that are either no-fly areas; avoidance areas; or the minimum altitude (greater than 2,000 feet AGL) personnel must fly at due to the use of the area (e.g., housing, cultural sensitivity, recreation).
- Public Hunting Policy Requirements and Procedures (USAG-PTA, 2018d).
  - Identifies hunter responsibilities, requirements to hunt, safety requirements, prohibited activities and restrictions, weapons procedures and restrictions, hunting areas and regulations, motor vehicle rules, dogs, and permits and fees.
- USAG-HI Regulation 200-4 Installation Hazardous Waste Management Plan (USAG-HI, 2018b).
  - This regulation established policies and procedures for handling, storing, and disposing of hazardous materials and waste across all USAG-HI installations. Policies and procedures have been developed to ensure hazardous materials and waste are treated in accordance with federal, state, DoD, and local regulations and to minimize generation of hazardous waste across all USAG-HI installations.
- U.S. Army Garrison-Hawaii Spill Prevention, Control, and Countermeasures Plan (USAG-HI, 2012).
  - The SPCCP has been prepared in accordance with the National and State Contingency Plan and contains guidance and procedures to identify locations and activities where the potential for harmful discharges from animal fat/vegetable oil, or petroleum, oil, and lubricants may occur; establish a spill prevention program; and identify procedures personnel must follow in response to a spill.
  - The SPCCP is applicable to all USAG-HI installations and contains site specific prevention, control, and countermeasures for PTA, that are applicable to State-owned Land, based on the facilities that use and store animal fat/vegetable oil, or petroleum, oil, and lubricants.
- Integrated Pest Management Plan, U.S. Army Garrison, Hawaii: 2015-2020 (USAG-HI, 2014).
  - Identifies responsibilities; necessary resources; administrative, safety, and environmental requirements; priorities for pest management.
- USARHAW Reg 350-19, Ranges and Training Areas (USARHAW, NDb).
  - This regulation established policies, procedures, and instructions to promote safe and sustainable use of training facilities. The Training Support System coordinates environmental issues on training lands including restrictions and environmental and cultural stewardship.

- U.S. Army Hawaii Integrated Training Area Management (ITAM) 5-Year Plan (USAG-HI, ND).
  - Four component program that is used to understand how the Army's training requirements impact land management practices, what the impact of training is on the land, how to mitigate and repair the impact, and communicate these issues to soldiers and the public. The 5-year plan is the Army's plan for managing the ITAM program for U.S. Army Hawaii.
- U.S. Army Garrison, Hawaii Installation Compatible Use Zone Study (USAG-HI, 2017b).
  - Army Compatible Use Buffer program (military departments to partner with private by avoiding land use conflicts while protecting and managing critical habitat for threatened and endangered species in the vicinity of the installation).
  - Joint Land Use Study (collaborative land use planning effort with local governments that evaluates the planning rationale necessary to support and encourage compatible development of land surrounding the installation organizations to establish buffer areas around active installations).
- Programmatic Agreement Among the U.S. Army Garrison, Pōhakuloa Training Area, the U.S. Army Garrison, Hawai'i, the Hawai'i State Historic Preservation Officer, and the Advisory Council on Historic Preservation Regarding Routine Military Training Actions and Related Activities at United States Army Installations on the Island of Hawai'i, Hawai'i (DA, 2018b).
  - Identifies stipulations for Army undertakings for training and related activities.
- U.S. Army Hawaii Statewide Operational Noise Management Plan (USAPHC, 2010).
  - Locate/relocate ranges relative to natural impediments such as in valleys or behind large stands of trees.
  - Construct artificial berms or enclose small arms ranges within walls and baffles.
  - Orient noise sources toward the interior of the installation property.
  - Implement fly-neighborly programs that adjust aircraft training times and routes to lower the impact on the community to the greatest extent possible given mission requirements.
  - Adjust the timing, where feasible, of particularly disruptive activities to avoid conflicts with local events such as church times or holidays.
  - Keep the community informed (when feasible), making public any unusual increases in the intensity of training or if training is to be resumed after a period of inactivity.
  - Review of Environmental Assessments and Environmental Impact.
  - Statements to ensure that the noise impacts of the proposed actions are addressed and are consistent with the current Statewide Operational Noise Management Plan.
  - Physical monitoring of the noise environment (as opposed to computer modeling) when the noise environment is controversial, when a noise zone III exists in a noise sensitive area, and when a noise is unique and cannot be modeled.
  - Incorporate noise contours as a GIS layer so that the contours may be combined with other layers (such as land use) and referenced when siting new facilities.

- U.S. Army Garrison-Pohakuloa Training Area Memorandum for Record: Best Management Practices to prevent negative impacts to natural resources from construction activities (USAG-PTA, 2015b).
  - Inspect and clean all construction vehicles and earth-moving equipment to remove soil, seeds, and invasive animals before moving equipment on to PTA construction sites.
  - Confine all construction equipment to the PTA area.
  - Educate construction employees to be mindful of seed/soil on footwear and clothing to maintain clean vehicles to minimize the movement of soil and seeds from outside PTA.
  - Coordinate with the PTA Natural Resources Office if additional auxiliary construction support sites are located outside of the established construction footprint.
  - Coordinate nighttime construction activities with PTA Natural Resources Office.
  - Follow established Army protocols for the proper use and disposal of petroleum, oils, and lubricants when refueling or working on any construction equipment or vehicles.
  - Follow all speed limits to minimize airborne dust that settles on endangered and threatened plants located close to access roads.
  - Report any sightings of Hawaiian geese or Hawaiian hoary bats to the contract representation.
  - Report immediately to the contract representative if a Hawaiian geese or Hawaiian hoary bat is injured or killed. Cease work in the immediate area until the PTA Natural Resources Office investigates the incident.
  - Report immediately to the contract representative if any birds are discovered in underground lava tubes or openings in the lava. Cease work in the immediate area until the PTA Natural Resources Office investigates.
  - Keep vehicles on established roads while in transit to the construction site.

### **Standard Operating Procedures**

- Integrated Wildland Fire Management Plan U.S. Army Garrison Pohakuloa (USAG-PTA, 2021e).
  - Identifies responsibilities, fire prevention requirements, pre-suppression actions, fire suppression actions, and post-fire actions, as well as a fire safety briefing.
- PTA Invasive Pest Prevention Standard Operation Procedures (USAG-PTA, 2018b).
  - Lists protocols for preventing the introduction of harmful invasives pests, including reptiles, amphibians, invertebrates, weeds, and the fungus that causes Rapid Ohī‘a Death, into PTA.
- U.S. Army Garrison-Pohakuloa Training Area (PTA) External Standard Operating Procedures (USAG-PTA, 2018a).
  - This 350-page document identifies procedures, rules, and restrictions for units training at PTA. It includes responsibilities; administrative forms; range operations, maintenance, clearing; base operations; communications; public works procedures; conservation management restrictions; environmental compliance requirements; digging and excavation requirements; airfield and aircraft operations guidance and requirements; logistics (e.g., fuel and

- ammunition supply); emergency services; safety requirements (e.g., fire prevention, handling of ammunition and explosives, speed limit); and convoy routes and procedures.
- Environmental compliance requirements:
    - Hazardous substances must be stored and used properly
    - Units training at PTA must have an appointed Environmental Compliance Officer that fully understands the applicable requirements
    - Lists requirements for each common hazardous waste or used hazardous substance
    - Adequate spill response supplies (e.g., biodegradable oil sponge or peat moss) and equipment must be on hand
    - Protocols for gray-water associated with field kitchens and laundries
  - Digging/excavation restrictions:
    - Digging survivability positions (approximately 3 feet wide and 4 feet deep) is only permitted in previously used areas and only with hand tools (i.e., shovels and picks)
    - Do not disturb, remove rocks from, or walk on rocky outcroppings
    - Do not cut/remove plants or trees
    - Built-up survivability positions must be constructed of sandbags or other foreign materials (not on-site lava rock)
    - Survivability positions must be restored to original condition after training
    - DoD personnel are to contact PTA Range Operations to determine if an excavation permit is required
    - Mechanical excavation is only permitted at one firing point on State-owned land and requires a dig plan.
  - PTA Range Operations Standing Operating Procedures (USARHAW, 2022).
    - This 172-page document identifies the regulations, general precautions, responsibilities, and instructions for using, working, or occupation of range facilities and maneuver areas at PTA. This document includes procedures for range access and scheduling; general range safety and restrictions; digging and excavation requirements; range operations and clearing procedures; air and airborne operations; procedures for use of training areas, observation posts, and ammunition holding areas; and requirements for special use munitions, artillery, mortars, burn pan operations.
    - This document supersedes Appendix A in U.S. Army Garrison-Pohakuloa Training Area (PTA) External Standard Operating Procedures (2018).
    - Range clearance procedures:
      - Units are required to submit a range and training area clearing plan to Range Operations no later than 7 days prior to final departure.
      - All ranges require a dedicated clearance day at the end of training to ensure proper cleanup is performed.

- Any mechanical or man-made holes will be covered and the ground restored to the original state. This includes holes made by artillery and mortar weapons systems.
- All trash, ammunition, and ammunition residue (e.g., cartridge cases, links, safety wires, nose plugs, launch tubes, pull rings and levels, fin protectors, igniters, firing devices, cardboard and wooden boxes, pallets) must be removed from ranges, training areas, roads, and trails.
- All wire, barrier material, wood materials, used sand bags, paper targets, plastic silhouette targets, and metal stakes are to be removed from the ranges and training areas.
- A joint clearance inspection by Range Operations and Range Maintenance personnel is required for all ranges unless otherwise indicated in the range specific procedures.
- The entire training area and firing point must be inspected, not just a portion.
- Range Division personnel conducting the inspection will take possession of the equipment, enter receipt information on the unit's range or training area sign-out, and include their name, date, and time of clearing.
- There are range specific clearing procedures for the ammunition holding areas, Battle Area Complex, bivouac areas, firing points, forward operating bases, military operations on urban terrain facility, forward arming and refueling points, and each range.

# **State General Lease S-3849**

**State General Lease S-3849 (1964)**

**2010 Amendment to State General Lease S-3849**



**State General Lease S-3849 (1964)**



RECORDATION REQUESTED BY:  
U. S. Army Engineer Division,  
Pacific Ocean

STATE OF HAWAII  
BUREAU OF CONVEYANCES  
RECEIVED FOR RECORD

LIBER 4821 PAGES 425 TO 444

AFTER RECORDATION, RETURN TO:

'64 AUG 20 PM 1:37

/s/ M. Adachi

U.S. Army Engineer Division,  
Pacific Ocean  
Phone: 542986

INDEXED /1/ EK REGISTRAR

RETURN BY: MAIL ( ) PICKUP (X)

SPACE ABOVE THIS LINE FOR REGISTRAR'S USE

STATE OF HAWAII

DEPARTMENT OF LAND AND NATURAL RESOURCES

STATE GENERAL LEASE NO. S-3849  
U. S. LEASE, CONTRACT NO. DA-94-626-ENG-80

1. THIS LEASE, made and entered into this 17<sup>th</sup>  
day of August, in the year one thousand nine hundred  
and sixty-four by and between the STATE OF HAWAII, represented  
by its Board of Land and Natural Resources, whose address is  
P. O. Box 621, Honolulu, Hawaii, 96809, and whose interest in  
the property hereinafter described is that of fee simple  
owner, for itself, its administrators, successors and assigns,  
hereinafter called the "Lessor", and THE UNITED STATES OF  
AMERICA, hereinafter called the "Government":

WITNESSETH: The parties hereto for the considera-  
tion hereinafter mentioned covenant and agree as follows:

2. The Lessor hereby leases to the Government  
three (3) parcels of land described on Exhibit "A" attached  
hereto and hereby made a part hereof, all to be used for the  
following purpose: Military purposes.

Serial A-105-1,243

POHAKULOA

004

3. TO HAVE AND TO HOLD the said premises for a term of sixty-five (65) years beginning August 17, 1964 and ending August 16, 2029; subject, however, to the rights of the Lessor and the Government respectively to terminate this lease in accordance with provisions 6 and 21 hereof.

4. The Government shall pay the Lessor rent at the following rate: ONE DOLLAR (\$1.00) for the term of the lease, the receipt and sufficiency whereof is hereby acknowledged.

5. The Government shall have the right, during the existence of this lease, to attach fixtures, and erect structures or signs, in or upon the premises hereby leased, which fixtures and structures or signs, so placed in, upon or attached to the said premises shall be and remain the property of the Government and may be removed or otherwise disposed of by the Government. In addition, the Government shall post and maintain signs on roads and trails entering dangerous areas to provide a warning of any dangerous or hazardous activities; provided, that the information placed on the posted signs anywhere within the demised premises shall not be incompatible with the terms of this lease and, in those instances where joint use of an area is permitted, the information placed on the signs may include the permitted activities.

6. The Government may terminate this lease at any time by giving thirty (30) days notice in writing to the Lessor.

7. Except as otherwise provided herein, the Government shall have unrestricted control and use of the demised premises including the right to fire all combat weapons

therefrom into the designated Pohakuloa Impact Area.

8. The Lessor will not be responsible for any loss, liability, claim, or demand for property damage, property loss, or personal injury, including but not limited to death, arising out of any injury or damage caused by or resulting from any act or omission of the Federal Government in connection with the Federal Government's use of the premises described herein.

9. In recognition of public use of the demised premises, the Government shall make every reasonable effort to stockpile supplies and equipment in an orderly fashion and away from established roads and trails and to remove or deactivate all live or blank ammunition upon completion of a training exercise or prior to entry by the said public, whichever is sooner.

10. The Government shall obtain the written consent of the Lessor prior to constructing any road or building of the type for which design and construction plans are normally required; provided, however, that such consent shall not be arbitrarily withheld. The Government agrees that its training roads which provide primary access within or across the demised premises will be maintained to normal standards for training area roads with due regard for preventing unnecessary erosion; provided, however, that the Government shall be under no obligation to maintain roads during periods when the necessary engineer troops are absent from the island of Hawaii.

10(a). The Government hereby agrees that all Government vehicles of any type will at all times be prohibited from using that portion of the demised premises indicated by a red

cross hatch on the map attached to and made a part of this lease. In addition, the Government hereby agrees that it will maintain at all times at least a two-strand wire fence along that part of the boundary bordering Parcel "C" colored in green on the said map.

11. In the interest of safety the Government shall have the right to interrupt traffic on the Saddle Road during training activities involving firing of and/or the passage of troops across the Saddle Road; provided, however, that the Government shall minimize interference with traffic by limiting stoppages thereof to 15 minute periods.

12. With the exception of artillery simulators, atomic bomb simulators and any similar devices, and explosives used in construction work, the Government shall not fire any live ammunition into any portion of the demised premises. This restriction does not apply to any portion of Parcel "A" deemed by the Government to be safe for smallarms firing. In addition, the Government shall not fire any weapons within three-fourths (3/4) of a mile of the Pohakuloa Ranger Station.

13. The Government shall take every reasonable precaution to prevent the start of any fire in the areas herein demised and shall take immediate and continuing action to extinguish any and all fires started by or resulting from Government training activities. Further, the Government shall establish and at all times maintain a standard operating procedure for fighting fires within or adjacent to the subject leased property resulting from Government training activities during its use and occupancy of the premises; provided, further, that Government personnel actually using

the premises shall be familiar with said standard procedure including the means of implementation.

14. In recognition of the limited amount of land available for public use, of the importance of forest reserves and watersheds in Hawaii, and of the necessity for preventing or controlling erosion, the Government hereby agrees that, commensurate with training activities, it will take reasonable action during its use of the premises herein demised to prevent unnecessary damage to or destruction of vegetation, wildlife and forest cover, geological features and related natural resources and improvements constructed by the Lessor, help preserve the natural beauty of the premises, avoid pollution or contamination of all ground and surface waters and remove or bury all trash, garbage and other waste materials resulting from Government use of the said premises.

15. Except as required for defense purposes in times of national emergency, the Government shall not deliberately appropriate, damage, remove, excavate, disfigure, deface or destroy any object of antiquity, prehistoric ruin or monument.

16. The Lessor shall have the right to erect signs and construct capital improvements within the leased property at locations mutually agreed upon by the parties hereto, in connection with water conservation, public water consumption, forestry, recreational and related purposes, said capital improvements including but not limited in any way to the construction, maintenance and/or improvements of roads and trails; provided, however, that notwithstanding any other provisions of this lease to the contrary, the Government

hereby accepts the responsibility and liability for repairs of any damage which can be demonstrated to have been the direct result of military activities, to improvements constructed by the Lessor subsequent to the date of this lease.

17. To the extent permitted by training requirements the Government will cooperate with the Lessor in the game development and hunting programs of the Lessor and, in connection therewith, the Government agrees that Parcels "A", "B" and "C" hereof shall remain available for the aforesaid programs of the Lessor and, further, that Parcels "B" and "C" and all that part of Parcel "A" which lies to the north of the Saddle Road shall be made exclusively available to the Lessor for hunting during the periods 1 July through 15 July and 1 December through 15 January and on national holidays from dawn to midnight and on weekends from midnight Friday through midnight Sunday during the periods 1 November through 30 November and 16 January through 31 January. The Lessor shall also have the right to construct a road along a mutually agreeable route through the northerly portion of Parcel "C" hereof.

18. The Lessor hereby agrees that, commensurate with the public use of the premises herein demised, it will take reasonable action during the use of the said premises by the general public, to remove or bury trash, garbage and other waste materials resulting from use of the said premises by the general public.

19. Subject to obtaining advance clearance from the plans and training office of the Government's controlling agency, or any other designated Government agency, officials and employees of the Lessor shall have the right to enter

upon the demised premises at all reasonable times to conduct any operations that will not unduly interfere with activities of the Government under the terms of this lease; provided, however, that such advance clearance shall not be unreasonably withheld.

20. All persons legally entitled under the provisions of this lease to be on the said premises shall have a nonexclusive right to use all Government roads and trails except when such use will interfere with the training activities of the Government or said roads and trails have been restricted, by a duly posted sign, as security or danger areas by the Government.

21. In the event that the leased property is not used by the Government for a period of three (3) consecutive years, this lease may be terminated upon ninety (90) days written notice from the Lessor to the Government, provided, however, that if prior to the expiration of the aforesaid 90-day period the Secretary of the Army shall find and determine that the leased property is required for military purposes and shall notify the Lessor in writing of this finding and determination, this lease will continue in effect; provided, further, that periods during which a national emergency has been declared by the President or the Congress of the United States and periods during which major combat elements are temporarily deployed away from the State of Hawaii shall not be included in the said three-year period. During such period of temporary deployment the parties hereto shall discuss and give consideration to and provide for the additional public use of the demised premises compatible with then

existing military training requirements. The Government will assure that current military standards concerning adequate utilization are applied to these premises and will assure that such use is known and is a matter of record and available to the Lessor upon request.

22. The Lessor reserves unto itself all ground and surface water, ores, minerals and mineral rights of every description on, in or under the demised premises but shall exploit or permit others to exploit the said ores, minerals and mineral rights only with the consent of the Government. Notwithstanding the foregoing reservation, the Government shall have the right to develop and use for road construction projects on the demised premises sources of coral, rock and similar materials occurring naturally on the said premises and to use said ground and surface waters for purposes incident to the rights granted by this lease.

23. The Government will not be responsible for any loss, liability, claim or demand for any property damage, property loss, or personal injury, including but not limited to death, arising out of injury or damage caused by or resulting from any act or omission of the Lessor or the general public in connection with their use of the premises described herein.

24. Any notice under the terms of this lease shall be in writing signed by a duly authorized representative of the party giving such notice, and if given by the Government shall be addressed to the Lessor at P. O. Box 621, Honolulu, Hawaii, 96809, and if given by the Lessor shall be addressed to the Division Engineer, U. S. Army Engineer Division, Pacific Ocean, Building 96, Fort Armstrong, Honolulu, Hawaii,

Attention: Real Estate Division or at such location and to such other agency as may be mutually agreed upon by the parties hereto.

25. The Government hereby agrees that the use and enjoyment of the land herein demised shall not be in support of any policy which discriminates against anyone based upon race, creed or color.

26. The Government shall not grant any interest in the demised premises; provided, however, that the Government shall have the right to grant the use of portions of the premises for temporary activities of Governmental agencies or their contractors in which case any land rental derived from such use of the premises shall be covered into the Treasury of the State of Hawaii.

27. Subject to obtaining the prior approval of the Government, the Lessor reserves the right to grant rights or privileges to others not inconsistent with the terms of this lease affecting the whole or any portion of the demised premises.

28. The Government agrees to reforest areas, as expeditiously as practicable and within a period mutually agreed upon, where it can be demonstrated that substantial forest cover, including trees, has been destroyed as a direct result of Government activities; provided, however, that the Lessor shall obtain advance Government approval of all future plantings proposed by the Lessor.

29. The Government shall surrender possession of the premises upon the expiration or sooner termination of this lease and, if required by the Lessor, shall within

sixty (60) days thereafter, or within such additional time as may be mutually agreed upon, remove its signs and other structures; provided that in lieu of removal of structures the Government abandon them in place. The Government shall also remove weapons and shells used in connection with its training activities to the extent that a technical and economic capability exists and provided that expenditures for removal of shells will not exceed the fair market value of the land.

30. (a) That, except as otherwise provided in this lease, any dispute concerning a question of fact arising under this lease which is not disposed of by agreement shall be decided by the Division Engineer, U. S. Army Engineer Division, Pacific Ocean, Honolulu, Hawaii, hereinafter referred to as said officer, who shall within a reasonable time reduce his decision and the reasons therefor to writing and mail or otherwise furnish a copy thereof to the Lessor. The decision of the said officer shall be final and conclusive unless, within thirty (30) days from the date of receipt of such copy, the Lessor mails or otherwise furnishes to the said officer a written appeal addressed to the Secretary of the Army. The decision of the Secretary or his duly authorized representative for the determination of such appeals shall be final and conclusive unless determined by a court of competent jurisdiction to have been fraudulent, or capricious, or arbitrary, or so grossly erroneous as necessarily to imply bad faith, or not supported by substantial evidence. In connection with any appeal proceeding under this condition, the Lessor shall be afforded an opportunity to be heard and to offer evidence in support of its appeal.

(b) This Condition does not preclude consideration of law questions in connection with decisions provided for in paragraph (a) above: Provided, that nothing in this Condition shall be construed as making final the decision of any administrative official, representative, or board on a question of law.

(c) That all appeals under this provision shall be processed expeditiously.

31. The Government's compliance with all obligations placed on it by this lease shall be subject to the availability of funds.

32. The Lessor's compliance with any obligations which may be placed on it by this lease shall be subject to the availability of funds and/or personnel.

33. The Lessor warrants that no person or selling agency has been employed or retained to solicit or secure this lease upon an agreement or understanding for a commission, percentage, brokerage, or contingent fee, excepting bona fide employees or bona fide established commercial or selling agencies maintained by the Lessor for the purposes of securing business. For breach or violation of this warranty the Government shall have the right to annul this lease without liability or in its discretion to deduct from the lease price or consideration the full amount of such commission, percentage, brokerage, or contingent fee.

34. No member of or delegate to Congress or resident commissioner shall be admitted to any share or part of this lease or to any benefit that may arise therefrom, but this provision shall not be construed to extend to this lease if

made with a corporation for its general benefit.

35. (a) The Government may, by written notice to the Lessor, terminate the right of the Lessor to proceed under this lease if it is found, after notice and hearing, by the Secretary of the Army or his duly authorized representative, that gratuities (in the form of entertainment, gifts, or otherwise) were offered or given by the Lessor, or any agent or representative of the Lessor, to any officer or employee of the Government with a view toward securing a lease or securing favorable treatment with respect to the awarding or amending, or the making of any determinations with respect to the performing of such lease; provided that the existence of facts upon which the Secretary of the Army or his duly authorized representatives makes such findings shall be in issue and may be reviewed in any competent court.

(b) In the event his lease is terminated as provided in paragraph (a) hereof, the Government shall be entitled (1) to pursue the same remedies against the Lessor as it could pursue in the event of a breach of the lease by the Lessor, and (2) as a penalty in addition to any other damages to which it may be entitled by law, to exemplary damages in an amount (as determined by the Secretary of the Army or his duly authorized representative) which shall be not less than three or more than ten times the costs incurred by the Lessor in providing any such gratuities to any such officer or employee.

(c) The rights and remedies of the Government provided in this clause shall not be exclusive and are in addition to any other rights and remedies provided by law or

under this lease.

36. This lease is not subject to Title 10, United States Code, Section 2662.

IN WITNESS WHEREOF, the parties hereto have hereunto subscribed their names as of the date first above written.

STATE OF HAWAII

By *James P. Loney*  
Chairman and Member  
Board of Land and Natural  
Resources

And By *R. L. Summers*  
Member  
Board of Land and Natural  
Resources

THE UNITED STATES OF AMERICA

By *Eugene H. Merrill*

Eugene H. Merrill  
Deputy Assistant Secretary of the Army (I&L)  
(Installations)

APPROVED AS TO FORM:

*Bert T. Kobayashi*  
Bert T. Kobayashi  
Attorney General  
State of Hawaii

*Peter C. Lewis*  
Peter C. Lewis  
Deputy Attorney General  
State of Hawaii

STATE OF VIRGINIA }  
COUNTY OF ARLINGTON } SS

On this 17<sup>th</sup> day of August, 1964, before me  
appeared Eugene H. Merrill, to me personally known  
who, being by me duly sworn, did say that he is the \_\_\_\_\_  
DEPUTY ASSISTANT SECRETARY OF ARMY  
(JAL, Installations), and that the seal affixed to  
said instrument is the seal of the Department of the Army and that the  
said instrument was signed and sealed in behalf of said United States  
of America under the authority therein mentioned, and said Eugene H. Merrill  
acknowledged said instrument to be the free act and  
deed of said United States of America.

In witness whereof I have hereunto set my hand and official seal.

My Commission Expires November 6, 1966

Howard V. Kempter  
NOTARY PUBLIC  
Arlington County, Virginia

FORM 314 Certificate of Official Character.

Commonwealth of Virginia }  
County of Arlington } to wit:

I, H. BRUCE GREEN, Clerk of the Circuit Court of the County aforesaid in the State of Virginia, the  
same being a Court of record, do certify that Howard V. Kempter  
whose genuine signature is attached to the foregoing certificate is, and was at the time of signing the same,  
a Notary Public in and for the said County, duly commissioned and qualified, residing in said County and  
duly authorized, by virtue of his office, to take acknowledgements to deeds and other writings, and to  
administer oaths under the laws of this State. I further certify that the official acts of the said  
Howard V. Kempter are entitled to full faith and credit; that I am  
well acquainted with the handwriting of the said Howard V. Kempter  
and verily believe his signature to the foregoing proof or acknowledgment to be genuine; and that his  
attestation is in due form of law. I further certify that the laws of Virginia do not require the im-  
print of the Notary's seal to be filed with the authenticating officer.

In testimony whereof I have hereunto set my hand and affixed the seal of the said Court this  
17<sup>th</sup> day of August, 1964, and in the 189<sup>th</sup> year of the Common-  
wealth.

H. Bruce Green  
Clerk

EXHIBIT "A"

TRACT A-105,<sup>1,2,3</sup> POHAKULOA TRAINING AREA

PARCEL "A"

Land situated at Kaohe, Hamakua and Puuanahulu, North Kona, Hawaii.

Being portions of the Government lands of Kaohe and Puuanahulu.

Beginning at the southeast corner of this piece of land, the coordinates of the said point of beginning from Government Survey Triangulation Station "Omaokoili," being 5462.74 feet North and 14,081.19 feet West, thence running by azimuths measured clockwise from True South:

1. 111° 10' 6,000.00 feet along the Pohakuloa Impact Area;
2. 28° 30' 800.00 feet along the Pohakuloa Impact Area;
3. 118° 30' 1,400.00 feet along the Pohakuloa Impact Area;
4. 208° 30' 1,100.00 feet along the Pohakuloa Impact Area;
5. 113° 50' 9,600.00 feet along the Pohakuloa Impact Area;
6. 74° 20' 3,300.00 feet along the Pohakuloa Impact Area;
7. 116° 30' 2,900.00 feet along the Pohakuloa Impact Area;
8. 90° 48' 1,670.00 feet along the Pohakuloa Impact Area;
9. 110° 00' 4,700.00 feet along the Pohakuloa Impact Area;
10. 58° 00' 3,600.00 feet along the Pohakuloa Impact Area;
11. 22° 30' 1,300.00 feet along the Pohakuloa Impact Area;
12. 79° 40' 3,700.00 feet along the Pohakuloa Impact Area;
13. 85° 10' 3,000.00 feet along the Pohakuloa Impact Area;

14. 359° 29' 1,132.00 feet along the Pohakuloa Impact Area;
15. 89° 10' 21,730.00 feet along the Pohakuloa Impact Area;
16. 221° 36' 51" 5,539.10 feet along the remainder of the Government Land of Puuanahulu;
17. 183° 36' 51" 9,400.00 feet along the remainder of the Government Land of Puuanahulu;
18. 249° 06' 51" 11,000.00 feet along the remainder of the Government Land of Puuanahulu;
19. 306° 06' 51" 2,500.00 feet along the land of Waikoloa;
20. 300° 23' 51" 12,201.50 feet along the land of Waikoloa;
21. 175° 29' 01" 8,646.00 feet along the land of Waikoloa;
22. 181° 29' 01" 1,617.00 feet along the land of Waikoloa;
23. 191° 29' 01" 2,046.00 feet along the land of Waikoloa;
24. 174° 29' 01" 700.00 feet along the land of Waikoloa;
25. 237° 02' 31" 800.61 feet along portion of Kaohē;
26. 319° 59' 01" 9,000.00 feet along portion of Kaohē;
27. 287° 29' 01" 11,000.00 feet along portion of Kaohē;
28. 288° 40' 7,832.30 feet along "Parcel B" hereof;
29. 10° 53' 30" 2,713.32 feet along Parcel A of Governor's Executive Order 1719, and across the Saddle Road;
30. 288° 13' 2,247.05 feet along the southerly boundary of the Saddle Road;
31. 276° 47' 30" 207.36 feet along the southerly boundary of the Saddle Road;
32. 271° 54' 30" 4.00 feet along the southerly boundary of the Saddle Road;
33. 1° 54' 30" 2,600.00 feet along Parcel B of Governor's Executive Order 1719;
34. 271° 54' 30" 3,215.00 feet along Parcel B of Governor's Executive Order 1719;

35. 181° 54' 30" 2,598.25 feet along Parcel B of Governor's Executive Order 1719;
36. 271° 59' 937.10 feet along the southerly boundary of the Saddle Road;
37. 269° 44' 30" 2,115.14 feet along the southerly boundary of the Saddle Road;
38. 280° 44' 110.88 feet along the southerly boundary of the Saddle Road;
39. 290° 20' 1,036.00 feet along the southerly boundary of the Saddle Road;
40. 288° 44' 275.15 feet along the southerly boundary of the Saddle Road;
41. 22° 28' 45" 5,075.66 feet along Mauna Kea Forest Reserve and Parcel "C" hereof;
42. 354° 00' 5,350.00 feet along Parcel "C" to the point of beginning and containing a GROSS AREA OF 15,480 ACRES, more or less, excluding therefrom approximately 60 acres of Saddle Road, leaving a NET AREA OF 15,420 ACRES, more or less.

PARCEL "B"

Land situated at Kaohe, Hamakua, Hawaii, Hawaii.

Being a portion of the Government Land of Kaohe and also being a portion of Mauna Kea Forest Reserve.

Beginning at a point on the southwesterly boundary of this piece of land, also being the northwest corner of Parcel A of Governor's Executive Order 1719 dated 26 January 1956, the coordinates of said point of beginning from Government Survey Triangulation Station "Omaokoili" being 19,465.73 feet North and 22,857.15 feet West, thence running by azimuths measured clockwise from True South:-

1. 108° 40' 7,832.30 feet along Parcel A to the boundary of Mauna Kea Forest Reserve;
2. 224° 59' 01" 4,000.00 feet along a portion of the Government Land of Kaohe;
3. 279° 30' 16,000.00 feet along the remainder of Mauna Kea Forest Reserve;

4. 315° 30' 3,000.00 feet along the remainder of Mauna Kea Forest Reserve;
5. 32° 30' 1,700.00 feet along the remainder of Mauna Kea Forest Reserve;
6. 5° 25' 30" 354.25 feet along the remainder of Mauna Kea Forest Reserve;
7. 37° 00' 2,750.00 feet along the remainder of Mauna Kea Forest Reserve;
8. 85° 30' 950.00 feet along the remainder of Mauna Kea Forest Reserve to the boundary of Parcel A of Governor's Executive Order 1719;
9. 213° 45' 1,650.00 feet along Parcel A of Governor's Executive Order 1719;
10. 101° 18' 10,869.06 feet along Parcel A of Governor's Executive Order 1719 to the point of beginning and containing an AREA OF 1,944 ACRES, more or less.

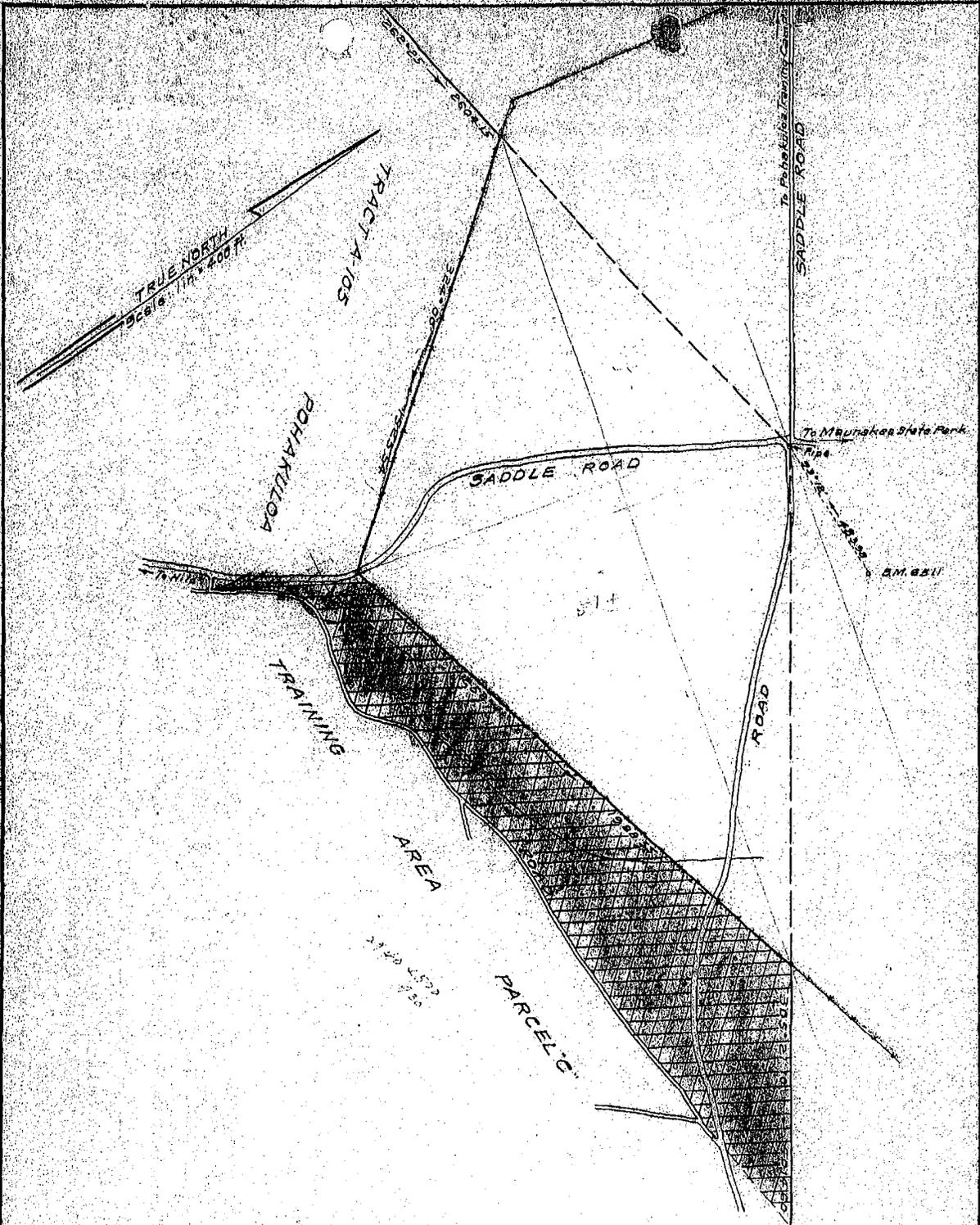
PARCEL "C" Part of A-105-1 & 200 of A-105-3

Land situated at Kaohe, Hamakua and Humuula,  
North Hilo, Hawaii, Hawaii.

Beginning at the most southerly corner of this piece of land, also being on the easterly boundary of the proposed Impact Area of Pohakuloa Military Reservation, the coordinates of the said point of beginning from Government Survey Triangulation Station "Omaokoili" being 9685.30 feet South and 2632.28 feet West, thence running by azimuths measured clockwise from True South:-

1. 156° 22' 3,297.35 feet along the proposed Impact Area of Pohakuloa Military Reservation;
2. 136° 30' 14,800.00 feet along the proposed Impact Area of Pohakuloa Military Reservation;
3. 154° 39' 1,540.00 feet along the proposed Impact Area of Pohakuloa Military Reservation;
4. 174° 00' 5,350.00 feet along Tract B of Pohakuloa Military Reservation;

5. 202° 28' 45" 2,100.00 feet along Tract B of Pohakuloa Military Reservation;
6. 262° 25' 2,604.15 feet along the remainder of Mauna Kea Forest Reserve (Governor's Proclamation dated May 2, 1938);
7. 324° 00' 1,525.54 feet along fence, along the remainder of Mauna Kea Forest Reserve (Governor's Proclamation dated May 2, 1938);
8. 258° 11' 1,988.55 feet along fence, along the remainder of Mauna Kea Forest Reserve (Governor's Proclamation dated May 2, 1938);
9. 305° 21' 10" 4,014.60 feet along the remainder of Mauna Kea Forest Reserve (Governor's Proclamation dated May 2, 1938);
10. 231° 30' 4,500.00 feet along the remainder of Mauna Kea Forest Reserve (Governor's Proclamation dated May 2, 1938);
11. 315° 00' 10,000.00 feet along the remainder of Mauna Kea Forest Reserve (Governor's Proclamation dated May 2, 1938) to the boundary between Humuula and Kaohe;
12. 39° 58' 12" 1,600.00 feet along Humuula;
13. 16° 57' 40" 5,307.56 feet along the remainder of Humuula;
14. 36° 58' 30" 5,718.57 feet along the remainder of Humuula;
15. 144° 20' 30" 171.84 feet along the northeasterly boundary of the Saddle Road to the boundary between Humuula and Kaohe;
16. 15° 12' 18" 4,768.28 feet along Humuula to the point of beginning, and containing a GROSS AREA OF 5,659 ACRES, more or less, excluding therefrom the Saddle Road, 100-foot wide right-of-way (52 acres, more or less) leaving a NET AREA OF 5,607 ACRES, more or less.



**EXHIBIT "B"**

*Map showing fence and roads near  
Maunakea State Park*

JOB  
G. BK

023

TAX MAP

SURVEY DIVISION  
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES  
STATE OF HAWAII

308 F. NG

27 AUG 8 1964





**2010 Amendment  
to State General Lease S-3849**





its meeting held on September 11, 2009, has approved the amendment to General Lease No. S-3849 for the purposes of amending paragraph 22.

NOW, THEREFORE, the Lessor and Government covenant and agree that paragraph 22 of General Lease No. S-3849, is hereby deleted in its entirety and replaced with the following:

"The Lessor reserves unto itself all ground and surface water, ores, minerals and mineral rights of every description on, in or under the demised premises but shall exploit or permit others to exploit the said ores, minerals and mineral rights only with the consent of the Government. Notwithstanding the foregoing reservation, the Government shall have the right to develop and use coral, rock and similar materials occurring naturally on the said premises for the following construction activities; (a) road projects on the demised premises, (b) the Stryker Brigade Combat Team (SBCT) Battle Area Complex to be constructed partially on the demised premises and partially on lands set aside to the Government by Presidential Executive Order 11167 dated August 19, 1964; (c) the SBCT Tactical Vehicle Wash Facility to be constructed on lands set aside to the Government under Governor's Executive Order No. 1719 dated January 26, 1956; and (d) the SBCT Ammunition Holding Area #2 to be constructed on lands set aside to the Government under Presidential Executive Order 11167 dated August 19, 1964. In addition, the Government shall have the right to use ground and surface waters on, in or under the demised premises for purposes incident to the rights granted by this lease."

IN CONSIDERATION THEREOF, the Lessor and Government further agree that this Amendment of Lease Agreement is subject to all the covenants and conditions in the General Lease No. S-3849, except as herein provided.

This Amendment, read in conjunction with the General Lease No. s-3849 sets forth the entire agreement between the Lessor and Government; and the general lease as amended and modified hereby shall not be altered or modified in any particular except by a memorandum in writing signed by the Lessor and Government.

356925\_1.DOC

-2-

DEPARTMENT OF LAND AND NATURAL RESOURCES  
LAND DIVISION  
P.O. BOX 621  
HONOLULU, HAWAII 96809

FOR OFFICIAL USE ONLY

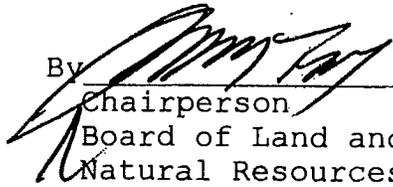
D-4

PRELIM. APPROV'D  
Department of the  
Attorney General

IN WITNESS WHEREOF, the STATE OF HAWAII, by its Board of Land and Natural Resources, has caused the seal of the Department of Land and Natural Resources to be hereunto affixed and the parties hereto have caused these presents to be executed the day, month, and year first above written.

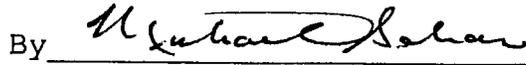
STATE OF HAWAII

Approved by the Board of Land and Natural Resources at its meeting held on September 11, 2009.

By   
Chairperson  
Board of Land and Natural Resources *MEM*

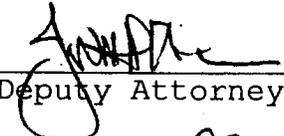
LESSOR

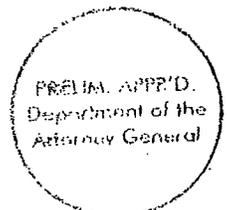
UNITED STATES OF AMERICA

By   
Michael Sakai  
Its Realty Contracting Officer  
US Army Corps of Engineers,  
Honolulu District

GOVERNMENT

APPROVED AS TO FORM:

  
Deputy Attorney General  
Dated: 11/23/09





# **Court-Ordered Management Plan for Leased Lands at Pohakuloa**



Electronically Filed  
FIRST CIRCUIT  
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IN THE CIRCUIT COURT OF THE FIRST CIRCUIT

STATE OF HAWAI`I

CLARENCE CHING and MARY	)	CIVIL NO. 14-1-1085-04 GWBC
MAXINE KAHAULELIO,	)	(Declaratory Judgment)
	)	
Plaintiffs,	)	
	)	
vs.	)	COURT ORDERED DLNR MANAGEMENT
	)	PLAN FOR LEASED LANDS AT
	)	POHAKULOA; APPENDIX I-IV
SUZANNE CASE, in her	)	(INCLUDING EXHIBITS "B"- "H")
official capacity as	)	
Chairperson of the Board of	)	
Land and Natural Resources	)	
and state historic	)	
preservation officer, BOARD	)	
OF LAND AND NATURAL	)	
RESOURCES, DEPARTMENT OF	)	
LAND AND NATURAL RESOURCES,	)	
	)	
Defendants.	)	
	)	

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COURT ORDERED DLNR MANAGEMENT  
PLAN FOR LEASED LANDS AT POHAKULOA

For good cause shown herein,

IT IS HEREBY ORDERED as follows:

**I. INTRODUCTION**

The remaining duration of the Lease term is relatively short and the United States has initiated land condition assessments and recently provided an executive summary of a land condition report for the leased area at Pohakuloa (Appendix II). These considerations, together with other unique circumstances associated with the leased area at Pohakuloa (i.e. ongoing military training activity, vast acreage, and enforcement limitations) have guided the parameters of this Court-Ordered Management Plan ("**COMP**") for Leased Lands at Pohakuloa. The goal of the COMP is to assess compliance with Lease requirements for appropriate removal of unexploded ordnance ("**UXO**") and debris associated with ongoing military training. This assessment is needed to ensure compliance with the Lease. This COMP is subject to available funding, safety and/or national security limitations. The Department of Land and Natural Resources ("**DLNR**") shall use available and reasonable efforts, that are commensurate with its constitutional, statutory, and contractual duties herein, to seek appropriate levels of funding to implement this COMP.

## II. INSPECTION PROTOCOL

### 1. Periodic Inspections

The Land Division of DLNR will conduct periodic inspections of the leased area. It is recommended by the Court, but not a mandatory component of this COMP, that these inspections be conducted at least once every year. The inspections will cover the inspection categories contained in the inspection form format attached hereto as Appendix I. The inspection report shall include: (a) a map of what areas were inspected; (b) photographs that depict the condition of the areas inspected; and (c) a narrative that identifies how much time was spent conducting the inspection and how many acres were inspected. It is recommended by the Court, but not a mandatory component of this COMP, that the inspection report contain a recommendation of: (a) areas that should be visited on the next inspection; and (b) any necessary corrective action. It is recommended by the Court, but not a mandatory component of this COMP, that inspections should attempt to cover 500 acres per inspection year.

Upon completion of an inspection report, DLNR shall make available (electronic copy is acceptable) a copy

of the inspection report to the Native Hawaiian Legal Corporation ("NHLC").

2. Notice of Inspection

It is recommended by the Court, but not a mandatory component of this COMP, that NHLC be provided at least thirty days advance notice of a planned inspection and that NHLC be permitted to designate up to two individuals to observe the inspection, subject to satisfactory completion of any advance security clearance as required by the United States. The observer(s) so designated shall not direct or interfere with the inspection, and shall not be permitted to photograph or record any portion of the inspection. Any reports or documentation of the inspection by the observer(s) shall be provided to DLNR.

3. Priority Areas to Be Inspected

The area just north of Lava Road and east of Kaua Road is a high priority for inspection. See Appendix IV at Exhibit F at 002660, 002664, 00265, 002668; Exhibit G; Exhibit H at 31-32. High priority shall be given to inspecting these specific areas highlighted in these documents to see if military debris remains in these areas. In addition, the nine areas identified in Appendix

II should be inspected by DLNR staff. Finally, the areas highlighted in Appendix IV at Exhibit B at 001172, 001207, 1216, 1218; Exhibit C at 002249, 002277, 002279; Exhibit D at 25 and 39; and Exhibit E at P000124 should also be inspected. While these areas are priority areas, subsequent inspections should include areas that have not been inspected previously.

4. Transparency

This COMP and the inspection reports shall be made publicly available and accessible electronically.

5. Recommendations for Corrective Action

It is recommended by the Court, but not a mandatory component of this COMP, that the inspection report contain recommendations for corrective actions, if any corrective actions are necessary. Recommendations for corrective action should include a projected or reasonable estimated time within which to take action.

6. Department of the Army Inspection Reports

It is recommended by the Court, but not a mandatory component of this COMP, that DLNR obtain and review periodic, semi-annual inspection reports from the United States in the general form attached as Appendix III, and provide any necessary assistance or support in seeking federal funding for cleanup of UXO and utilizing military personnel for non-CERCLA cleanup of military debris or other contaminants attributable to the United States activities under the Lease.

Potential federal funding sources for cleanup of active training areas include the Defense Environmental Restoration Program ("**DERP**"), the Compliance Clean-up ("**CC**") Program, and the Management Decision Evaluation Package ("**MDEP**") for Range Facilities and systems Modernization ("**VSRM**").

DATED: Honolulu, Hawai'i, April 20, 2021.

/s/ Gary W.B. Chang



JUDGE OF THE ABOVE-ENTITLED COURT

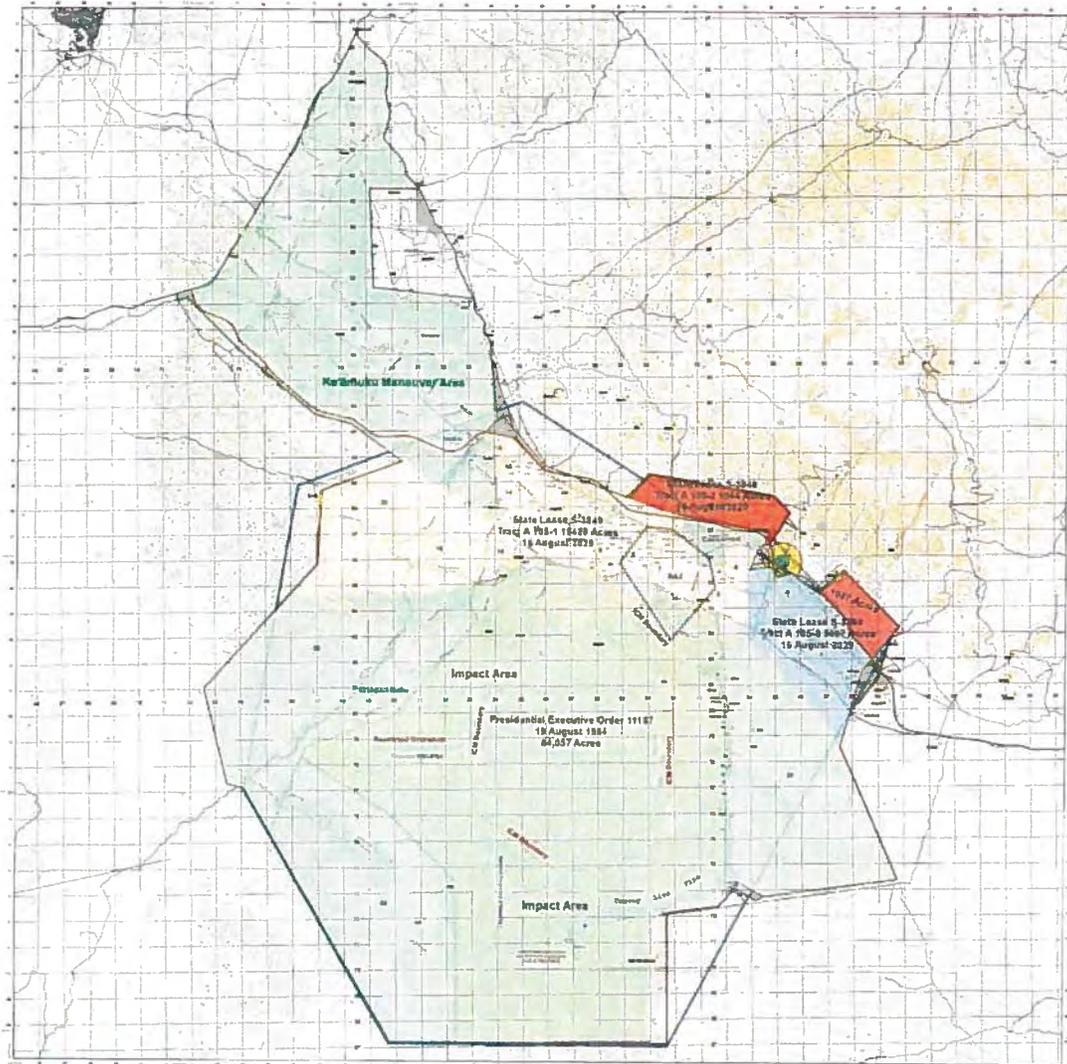
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CLARENCE CHING and MARY MAXINE KAHAULELIO vs.  
SUZANNE CASE, in her official capacity as  
Chairperson of the Board of Land and Natural  
Resources etc, et al.  
Civil No. 14-1-1085-04 GWBC  
COURT ORDERED DLNR MANAGEMENT PLAN FOR LEASED LANDS  
AT POHAKULO

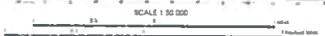
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SCALE 1:50,000

UNCLASSIFIED//~~FOUO~~  
PŌHAKULOA TRAINING AREA



Revised and Printed by ITMS PŌHAKULOA TRAINING AREA  
34 Mile Support Hwy, HI 96720  
Date: 11 June 2007/Revision Sup 0012  
Data provided by PFA Range Control, PFA Base Operations,  
PFA Environmental, PFA, Naval GSI, 20th Engineer  
Company, and US 20 Digital Line Graph Vectors



VERTICAL INTERVAL IS METERS  
ELEVATION DIMETERS

SYMBOLS

Blue line	Proposed 100' contour	Blue line	Proposed 200' contour
Blue line	Proposed 300' contour	Blue line	Proposed 400' contour
Blue line	Proposed 500' contour	Blue line	Proposed 600' contour
Blue line	Proposed 700' contour	Blue line	Proposed 800' contour
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Blue line	Proposed 1900' contour	Blue line	Proposed 2000' contour

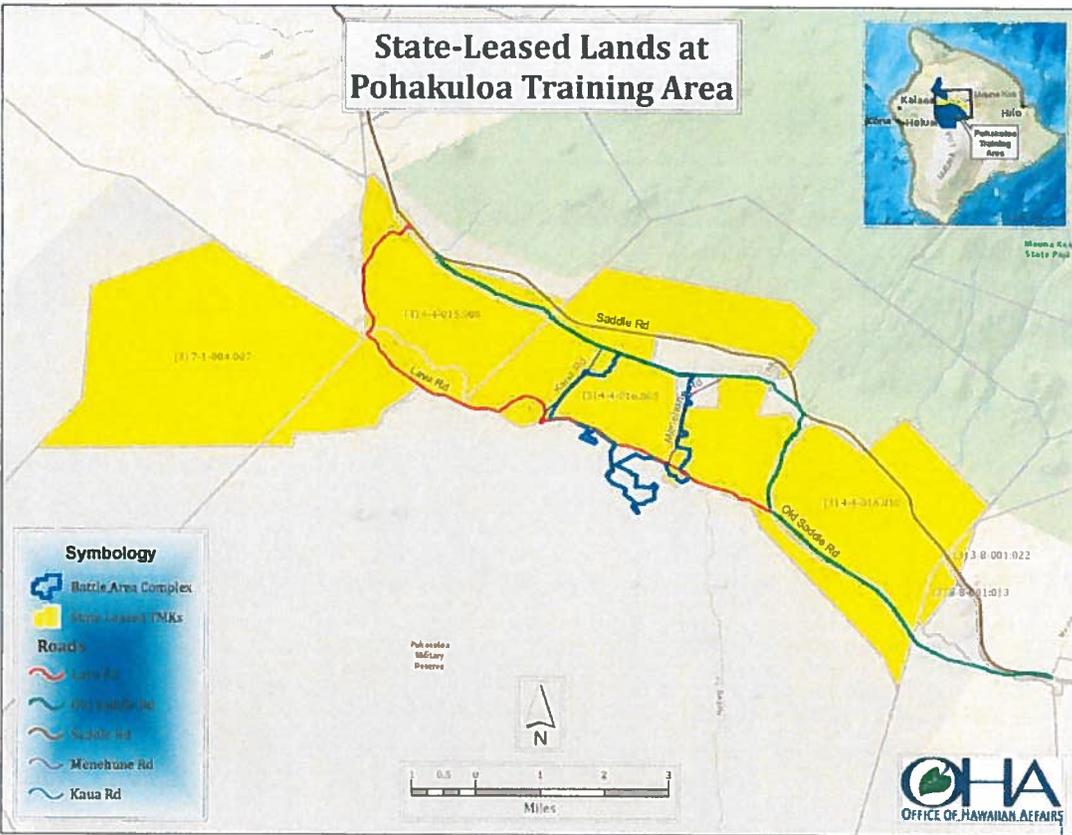


- 1. PFA Range Control
- 2. PFA Base Operations
- 3. PFA Environmental
- 4. PFA Engineering
- 5. PFA Logistics
- 6. PFA Maintenance
- 7. PFA Medical
- 8. PFA Personnel
- 9. PFA Security
- 10. PFA Training
- 11. PFA Utilities
- 12. PFA Communications
- 13. PFA Information Systems
- 14. PFA Legal
- 15. PFA Public Affairs
- 16. PFA Safety
- 17. PFA Quality Assurance
- 18. PFA Environmental
- 19. PFA Occupational Safety and Health
- 20. PFA Hazardous Waste
- 21. PFA Air Quality
- 22. PFA Noise
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- 296. PFA Transportation
- 297. PFA Distribution
- 298. PFA Procurement
- 299. PFA Contracting
- 300. PFA Construction

PŌHAKULOA TRAINING AREA

UNCLASSIFIED//~~FOUO~~  
LIMITED DISTRIBUTION

# State-Leased Lands at Pohakuloa Training Area



**Symbology**

- Battle Area Complex
- State-Leased TMKs
- Roads**
- Lana Rd
- Old Saddle Rd
- Saddle Rd
- Menehune Rd
- Kaula Rd



# **APPENDIX I**

**INSPECTION REPORT**  
Commercial/Industrial/Resort/Other Business

**General Information**

Document Number: GLS 3849 or RPS \_\_\_\_\_

Character of Use Military purposes

Inspection Date: 12/20/18 Inspection Time: 10:00 a.m.

Land Agent: Gordon Heit

**TENANT INFORMATION**

Name: United States of America (Dept. of Army)

Home Phone: \_\_\_\_\_

Address: P.O. Box 4607

Business Phone: \_\_\_\_\_

Hilo, Hawaii

Fax: \_\_\_\_\_

Contact Person: Lt. Col. Loreto V. Borce, Jr.

Contact Phone: 969-2407

**SITE INFORMATION**

TMK: (3) 4-4-015:008, (3) 4-4-016:005, (3) 7-1-004:007

Area: 22.971 acres, more or less

Site Address: Pohakuloa Training Area

Hamakua, North Kona, Island of Hawaii

**FISCAL INFORMATION**

ITEM	N/A	CURRENT= COMPLIANCE	DEFAULT = NON-COMPLIANCE	COMMENTS
Rent	X			
Liability Insurance	X			
Fire Insurance	X			
Bond	X			

**FIELD INSPECTION RESULTS** (refer to Field Inspection Worksheet)

ITEM	N/A	COMPLIANCE	NONCOMPLIANCE	COMMENTS/RECOMMENDATIONS
Subleases	X			
Improvements	X			
Premises		X		
Character of Use		X		For Military Purposes

**Field Inspection Worksheet**  
Commercial/Industrial/Resort/Other Business

**File Review**

**LICENSES/PERMITS/CONSENTS**

ITEM	DLNR Approval Docs in File			COMMENTS/NOTES/LISTS
	N/A	YES	NO	
Subletting	X			attach copy of list or map if applicable
Improvement Construction Buildings			X	note deadlines for % completion Some structures (i.e. Quonset huts) were built prior to the inception of the Lease. The Lease file does not indicate plan approval for any recent building or construction.
Improvement Construction Other structures/misc.		X		note deadlines for % completion Plan submitted and approved by Chairperson for the installation of electrical substations within the lease area.

**Field Inspection**

ITEM	SATISFACTORY?			COMMENTS/RECOMMENDATIONS
	N/A	YES	NO	
<b>SUBLEASES</b>				
Consents approved	X			
Use adheres to lease purpose	X			
<b>IMPROVEMENTS</b>				
<u>Buildings/Residences:</u> roof		X		
paint		X		
exterior		X		
interior		X		
<u>Structures:</u> roads		X		
walkways		X		
fencelines		X		
others				
<b>PREMISES</b>				See comments and recommendations below
clean, sanitary, orderly appropriate storage/use of hazardous materials		X		
<b>CHARACTER OF USE</b>				Military purposes
adheres to lease purpose		X		

ITEM	SATISFACTORY?			COMMENTS/RECOMMENDATIONS
	N/A	YES	NO	
Other:				

The designated use of this lease is for "Military Purposes". Historical and current uses of the area include military training and firing ranges used to fire weapons from the leased area into the Pohakuloa Impact Area, which is located on federally owned lands within Presidential Executive Order 1167.

Prior to the execution of this lease, the leased area was used by the military for military maneuvers and target practice pursuant to a Maneuver Agreement with the Territory of Hawaii. Pre-lease activity included an impact area as well as anti-tank and artillery ranges.

During an inspection of the leased area in December 2014 and subsequent follow-up, three areas of concern were reported to Land Division, including: (1) a former Bazooka range associated with pre-lease activity; (2) a site containing numerous heavily-damaged target vehicles (with all fluids previously removed) used as targets for live-fire training; and (3) an above-ground site containing a quantity of spent artillery shells. The abandoned bazooka range and the storage of target vehicles do not indicate any violation of the terms of the lease, as contamination associated with the bazooka range predated the lease and storage of target vehicles with contaminants removed is consistent with the purposes of the lease. The presence of the above-ground site containing a quantity of spent artillery shells resulted in an 'unsatisfactory' notation on the December 23, 2014 inspection report.

During follow-up on the December 2014 inspection, two additional sites were identified as locations within the leased area that were being evaluated by the military. These consisted of two former landfill sites, one of which (landfill 1 - approx 285,297 sq. ft.) predated the lease and another (landfill 2 - 225,297 sq. ft.) which was used from 1979 to 1993 for solid municipal waste. Landfill 2 was capped when it was closed with an impermeable liner and then covered with cinder, which is consistent with lease requirements permitting burial of trash. The landfill sites are the subject of ongoing monitoring by the military and the State Department of Health, and no major deficiencies were identified in the most recent inspections.

Each of the areas of concern discussed above has been satisfactorily remediated. The former bazooka range was the subject of an extensive surface clearance effort with Native Hawaiian Veterans (NHV) as the primary contractor. Teams of workers used heavy equipment and helicopters to remove contaminated debris, and the demobilization process was completed by December 3, 2015 with no accidents or injuries. The site containing target vehicles was cleaned and the vehicles removed. The site containing spent artillery shells was the subject of a cleanup process using non-CERCLA funds, consisting of a team of workers physically removing the debris and placing it into a 10-yard roll-off container for removal.

In 2018, the military provided the Land Division with an executive summary of a land condition report relating to the leased area. The land condition report summary was part of an Environmental Condition of Property (ECOP) prepared by the military for use in determining if a property is suitable for acquisition, construction, or divestment. The ECOP investigation and reporting for Phase I and II was completed in June 2017. Extensive soil sampling was conducted and areas were identified based on possible contamination associated with historical land uses. Based on historical uses, the findings identified areas where there was a presence or likely presence of hazardous substances or petroleum products, including the two landfill sites identified above. The findings also identified a Tank gunnery range that predated the lease, a possible former burn pan/cinder pit, a former Davey Crockett Weapons System Range with the potential for the presence of radiological material, and various specific training areas and firing points. In addition to the land condition report summary, a draft periodic report was received referencing a large fire in the training area that occurred during the bi-annual RIMPAC training exercises.

The inspection conducted on December 20, 2018 began with a safety and range orientation briefing, followed by a physical inspection targeted toward gaining an overall view of the leased area and assessing any new areas of concern identified in the executive summary and the draft periodic report. The physical inspection began with a visit to Puu Ahi, an elevated area that provided a vantage point suitable for an overall view of the leased area.

The pre-lease Tank gunnery range has not been used for Tank gunnery exercises since the late 1970s. Upon inspection, the overall condition of the area was satisfactory, but some debris was identified which consisted of abandoned wooden and metal railroad track debris. There were no spent artillery shells observed or other types of military debris associated with the projectiles used for the Tank gunnery range. Although there is also no readily identifiable source of funding for clean up of this range, Deputy Garrison Commander Gregory R. Fleming indicated that a cleanup using non-CERCLA funds will be conducted by military personnel, and should be completed within a one to two year time frame. The former burn pan area was located and described as an area where a "burn pan" (a metal container approximately 20 feet long by 4 feet wide) may have been used for disposal of military debris. The area was identified as an area of concern based on its possible historical use, and there were no indications of any lease violations associated with the overall condition of the area, which was satisfactory. The former Davey Crockett Weapons System Range was the subject of a previous site investigation and Human Health Risk Assessment (HHRA). As a result of soil sampling and scientific analysis, the site assessment and HHRA found only background levels of contamination with no adverse human health impacts associated with exposure to the soil. The State Department of Health has concurred with the HHRA findings. The former Davey Crockett Weapons System Range and its associated impact area (which is off the leased area) are monitored both by the State Department of Health and the Nuclear Regulatory Commission. Two of the more heavily used firing points were identified during the inspection, and these firing points (as well as the firing point area for the former Davey Crockett Weapons System Range) were in satisfactory condition with no apparent lease violations. The area where the fire occurred during the RIMPAC exercises was observed from Puu Kea, an elevated vantage point. Landfill 2 was also visited during the December 20, 2018 inspection, as well as water tanks accessible by helicopters which are used for fire control within the Pohakuloa training area and surrounding areas. At the conclusion of the inspection, a debriefing was held and staff was provided additional information about fire prevention measures used at Pohakuloa Training Area, which are extensive. The US Fish and Wildlife is the primary agency responsible for addressing the recent fire, its impacts and any recommended actions to minimize future fire risks in this fire-prone area.

Current recommendations include continued landfill monitoring and debris removal, and completion of the recommended cleanup and remediation actions discussed above. Land Division has recommended that all reasonable avenues of future funding be explored and further assessment conducted. In addition, options were discussed to allow live or remote viewing of training activities. Possible options include review of digital post-training video from the Battle Area Complex (BAX) or scheduling of live observations of firing points used during upcoming training exercises. Based on the foregoing, the leased area is in satisfactory condition.

# **APPENDIX II**

Executive Summary  
ECOP Phase I and II  
Pohakuloa Training Area, Hawaii

An Environmental Condition of Property (ECOP) is an investigation in which the current environmental condition of the property is determined by examining current and historical uses of the property and adjoining properties. The results of an ECOP are used to determine if a property is suitable for acquisition, construction, or divestment. The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980 requires Federal agencies to evaluate the environmental condition of property and to take remedial action as necessary to protect human health and the environment before transferring property.

An ECOP was performed for the 22,971 acres of the State of Hawaii-owned, U.S. Army (Army)-leased lands within Pohakuloa Training Area (PTA), Hawaii (Subject Site). The Army lease (Hawaii State Lease No. S-3849; U.S. Lease DA-94-626-ENG-80) identifies the acreage as three parcels: Parcel A (A-105-1), Parcel B (A-105-2) and Parcel C (A-105-3). This ECOP serves as the means to establish the baseline environmental conditions at the Subject Site and meets the Department of Defense (DoD) requirement for preparation of an ECOP under provisions of the Base Redevelopment and Realignment Manual (DoD 4165.66-M, March 1, 2006), Section C8.3. The ECOP was performed in compliance with the ASTM International Standard Practice, ASTM E1527-13 (Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process). The ECOP investigation and reporting for Phase I and II was executed beginning in June 2016 and completed in June 2017.

ASTM E1527-13 defines a Recognized Environmental Condition (REC) as "the presence or likely presence of any hazardous substance or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment." ASTM E1527-13 includes four REC land classifications including (1) *de minimis* conditions, (2) RECs, (3) Historical RECs (HRECs), and (4) Controlled RECs (CRECs). The ECOP found that the Subject Site includes site-specific RECs as summarized in the table on the following page.

The ECOP determined the following results for the Subject Site by parcel based on the HRECs, CRECs, and potential RECs.

Parcel A (A-105-1, 15,420 acres, TMKs 3-4-4-015:008, 3-7-1-004:007, and portions of 3-4-4-016:005):

- Former Landfill 2 (~3.5 acres): This landfill was closed in 1993 and covered in 1996. Long-term management at the landfill is currently being conducted. Area is classified as ECOP Area Type 4 (an area where release, disposal, or migration, or some combination thereof, of hazardous substances has occurred, and all remedial action necessary to protect human health and the environment have been taken).
- Portion of Range 13/13A (~40 acres): From 1962 to 1968, the Davy Crockett Weapons System was intermittently used at this range. The body of the Davy Crockett Weapons System spotting round was made of a depleted uranium alloy. A site investigation and Human Health Risk Assessment (HHRA) was completed and found no adverse human health impacts likely to occur as a result of exposure to the uranium present in the soil at PTA under current land uses. The State of Hawaii Department of Health concurred with the HHRA findings. Area classified as ECOP Area Type 4.
- Remainder of Parcel A is classified as ECOP Area Type 7 (an area that is unevaluated or requires additional evaluation). Recommended for additional evaluation based on the historical land uses.

Parcel B (A-105-2, 1,944 acres, portion of TMK 3-4-4-016:005):

- The entire parcel is classified as ECOP Area Type 1 (an area where no release or disposal of hazardous substances or petroleum products or their derivatives has occurred, including no migration of these substances from adjacent areas) due to limited training usage.

Parcel C (A-105-3, 5,607 acres, portion of TMK 3-4-4-016:005):

- The entire parcel is classified as ECOP Area Type 7. It is recommended for additional evaluation based on the historical land uses.

## Summary of HRECs, CRECs, and Potential RECs

	Site Name	PTA Lease Parcel	TMK	HREC, CREC, or Potential REC	Location Description
1	Former Bazooka Range	Parcel A A-105-1	3-7-1-004:007	Unexploded ordnance (UXO), munitions and explosives of concern (MEC), metals	Former firing range.
2	Former Tank Gunnery Range	Parcel A A-105-1	3-4-4-015:008	UXO, MEC	Site identified north of the Military Operation and Urban Terrain (MOUT) Area in the 1959 Range Control map. Area is visible on current aerial photos.
3	Current Burn Pan Area	Parcel A A-105-1	3-4-4-016:005	Potential MEC, metals, dioxins	Burn pan is located off of Subject Site.
4	Potential Former Burn Pan	Parcel A A-105-1	3-4-4-016:005	Potential MEC, metals, dioxins	Former potential burn pan/cinder pit area at Puu Puahi. No documentation located.
5	Former Davy Crockett Weapons System Range	Parcel A A-105-1	3-4-4-016:005	CREC - potential radiological materials	Range 13/13A and south of the cinder pit of Puu Puahi. HHRA completed and found no adverse human health impacts are likely to occur as a result of exposure to the uranium present in the soil. State of Hawaii Department of Health concurs with HHRA.
6	Former Target Vehicle Storage Site at FARP 18	Parcel C A-105-3	3-4-4-016:005	Potential petroleum, oil and lubricants (POL) constituents and metals.	Former Target Vehicle Storage Site at FARP 18. Debris has been removed. Soil contamination confirmed in ECOP Phase II.
7	Landfill 2	Parcel A A-105-1	3-4-4-016:005	Controlled REC - Remedial Action completed	Closed, capped former landfill.
8	Former Debris Pile TA 21	Parcel C A-105-3	3-4-4-016:005	Potential POL constituents and metals	Former metal debris pile TA 21. Material has been removed from site.
9	All TAs/FPs	Parcel A A-105-1, Parcel C A-105-3	various	UXO, MEC, metals	Heaviest use anticipated at the 400 Series FP based on past use.

# **APPENDIX III**



BY TO  
INATION OF:

**DEPARTMENT OF THE ARMY**  
U.S. ARMY INSTALLATION MANAGEMENT COMMAND, PACIFIC  
HEADQUARTERS, UNITED STATES ARMY GARRISON, HAWAII  
745 WRIGHT AVENUE, BUILDING 107, WHEELER ARMY AIRFIELD  
SCHOFIELD BARRACKS, HAWAII 96857-5000

Office of the Garrison Commander

**Semi-Annual Inspection Report**  
(July – December 20XX)  
State General Lease No. S-3849  
Pohakuloa Training Area

Purpose: To provide a status of activities/actions on the Parcel of Land Leased by the United States from the State of Hawaii, under State General Lease Number S-3849. This parcel of land is on the island of Hawaii and is referred to as Pohakuloa Training Area (PTA).

**NEW ACTIONS:**

1. July 20XX - Fire in Training Area 1 (see attached map): This fire occurred during a training activity. The total amount of area affected was XX acres. The fire was XX% within the leased parcel. Surveys conducted after the fire was extinguished indicated that no known cultural/historical resources were destroyed. Threatened and/or Endangered Species were affected by the fire, though none were eliminated from existence. The Army is working with the U.S. Fish and Wildlife Services regarding this issue.
2. The bi-annual RIMPAC exercise occurred from July XX-XX 20XX. During that time all training activities were conducted under the established standard operating procedures. Units training were represented by the following countries (not all inclusive): United States, Japan, Korea, Philippines, and Malaysia. During this exercise a large fire occurred within the limits of the lease. After fire surveys determined that no cultural/archeological sites were affected. No endangered species were deleted from existence. A follow-on report was provided to the U.S. Fish and Wildlife Service (enclosure).
3. The Annual Lightning Forge training exercise was partially conducted on PTA. No special actions were required as a result of the training exercise.
4. A new Programmatic Agreement (PA) which covers all routine and recurring activities at PTA is in its final stages of execution. The Agreement covers all Army training actions on the island of Hawaii, including actions on the leased parcel.

**UPDATES ON PREVIOUSLY REPORTED ACTIONS:**

1. On...

THOMAS J. BARRETT  
COL, U.S. Army  
Commanding

# **APPENDIX IV**

**EXHIBITS AND TRANSCRIPT FROM THE TRIAL**

# **EXHIBIT “B”**

H-01438

*4-4*  
*Draft Rev. 9/25/98*  
**ARCHAEOLOGICAL INVESTIGATIONS OF  
TWO WORK AREAS FOR THE LEGACY  
RESOURCE MANAGEMENT PROGRAM  
AT POHAKULOA TRAINING AREA,  
HAWAI'I ISLAND, HAWAII**

**FINAL**  
**March 1998**



**GANDA**

**Garcia and Associates**

**Consultants in Cultural and Natural Resources**

**729 Emily Street, Suite B  
Honolulu, HI 96813**

CIVIL NO. 14-1-1085-04 GWBC

PLAINTIFFS

EXHIBIT 22

IN EVIDENCE FOR IDENTIFICATION

REC'D \_\_\_\_\_, 2015

CLERK, 14<sup>th</sup> DIVISION  
001163

**EXHIBIT "B"**

previously inspected for archaeological sites pursuant to proposed artillery firing points, a firebreak/road route, and location of the Pu'u Leilani quarry (Streck 1986b).

### 1.1.2 Work Area 2

Work Area 2 is located within Training Areas 5 and 6, immediately south of Pu'u Pōhakuloa and Bradshaw Airfield. The parcel is bounded by Saddle Road, Lava Road, and Menehune Road and is entirely within the Hāmākua District. The most relevant previous surveys include Welch's (1993) investigation of Saddle Road and the Shapiro et al. (1998) inventory along Redleg Trail. Work Area 2 (ca. 486 ha. or 1,200 ac.) is classified as low to moderate in cultural resource sensitivity and site densities were anticipated in the range of zero-to-one per km<sup>2</sup> (Hammatt and Shideler 1991:5, 11). In general, the north half is characterized by open pasture and the south by aa and mixed lava flows. Extensive military use is evidenced by dirt roads, firing points, new buildings, a helicopter pad, rock constructions, and recent debris.

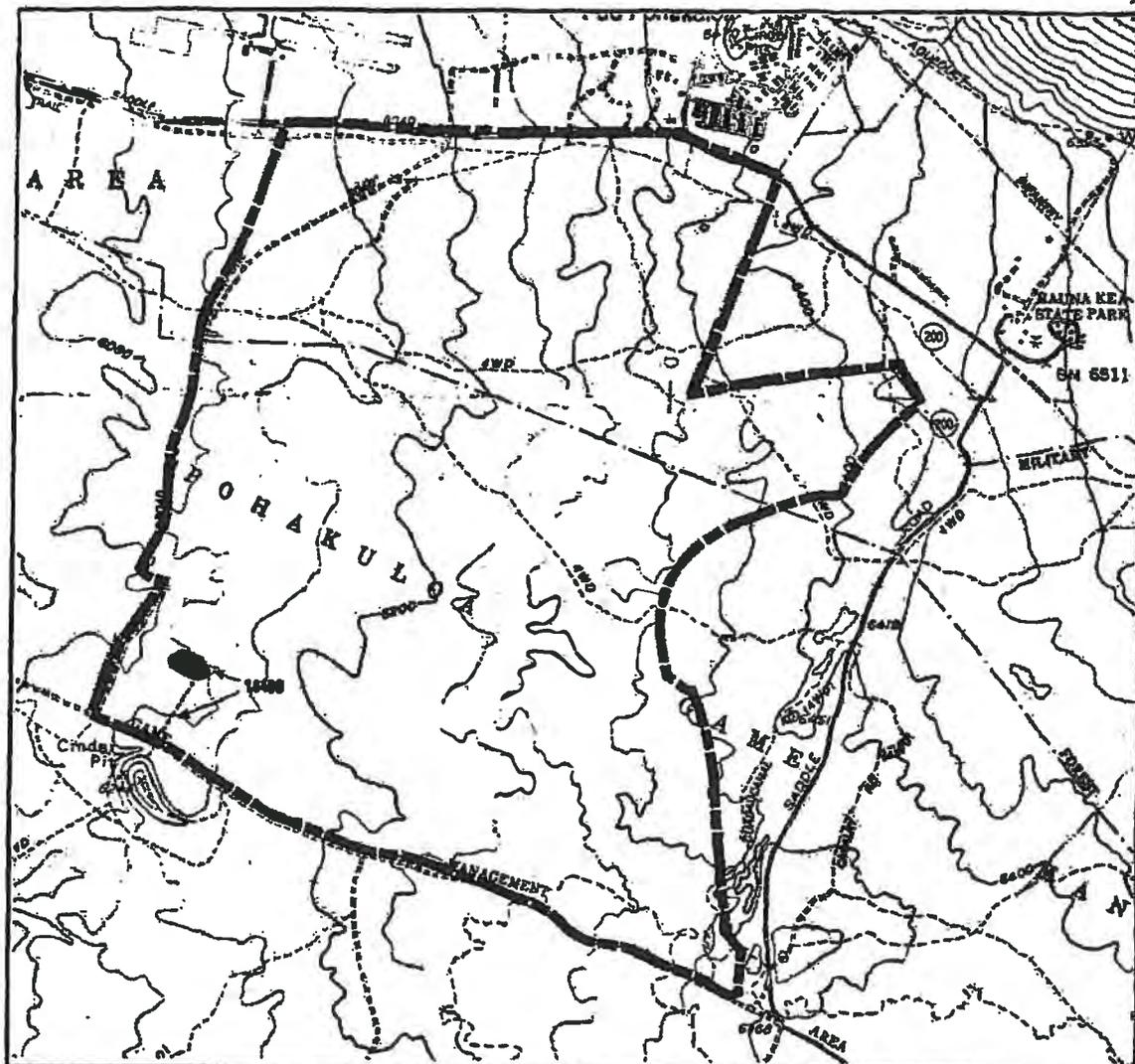
## 1.2 ENVIRONMENTAL SETTING

Elevation in the PTA ranges from 4,060 ft (1,238 m) amsl in the northwest corner to 8,880 ft (2,707 m) amsl in the southeast area (cf. Hommon and Ahlo 1983:6). Annual rainfall varies from 4 inches (102 mm) to 16 inches (406 mm). Fogs and occasional frosts occur in the area. Temperatures average about 60°F (15.6°C) in the lower elevations and 50°F (10°C) in the higher elevations. The upper altitudes are characterized by cooler winter temperatures (cf. Hommon and Ahlo 1983:10; Streck 1992:100).

The majority of the PTA is covered by pahoehoe and aa lava flows from Mauna Loa with a smaller area in the north PTA covered by soil and lava from Mauna Kea (Stearns and MacDonald 1946; Hommon and Ahlo 1983:7). Three of the Mauna Loa flows are from the recent past and date to A.D. 1843, 1859, and 1935. The pahoehoe lava flows contain subterranean geologic features such as tubes and blisters, some of which extend hundreds of meters beneath the ground. The tubes are most often entered by large collapsed sinks. Some of the pahoehoe flows formed surface chills of volcanic glass and dense, fine-grained basalt.

In Work Area 1, much of the lava underlying the northeast section is hawaiite from Mauna Kea (Wolfe and Morris 1996) and consists of "aa and blocky aa" interspersed with dense pahoehoe. These flows are dated before 10,000 B.P. The remaining part of the area is dominated by weathered pahoehoe, some aa, and interspersed by *kīpuka*. The earliest of these flows in the southwest are between 5,000 and 3,000 years B.P. (k1y). They are surrounded by younger flows dated between 3,000 to 1,500 B.P. (k2) and another further east (k3) dated to 1,500 and 750 B.P. (Figure 2).

Work Area 2 is dominated by two early lava flows: one from Mauna Kea (1) dated before 10,000 B.P. and the other from Mauna Loa (k2) dated from 3,000 to 1,500 B.P. The former flow tends to consist of aa and blocky aa while the latter tends to consist of an old and badly weathered pahoehoe (Figure 2). Much of this latter terrain has been heavily disturbed by military activities.



**Figure 9. Archaeological site locations:  
Work Area 2.**

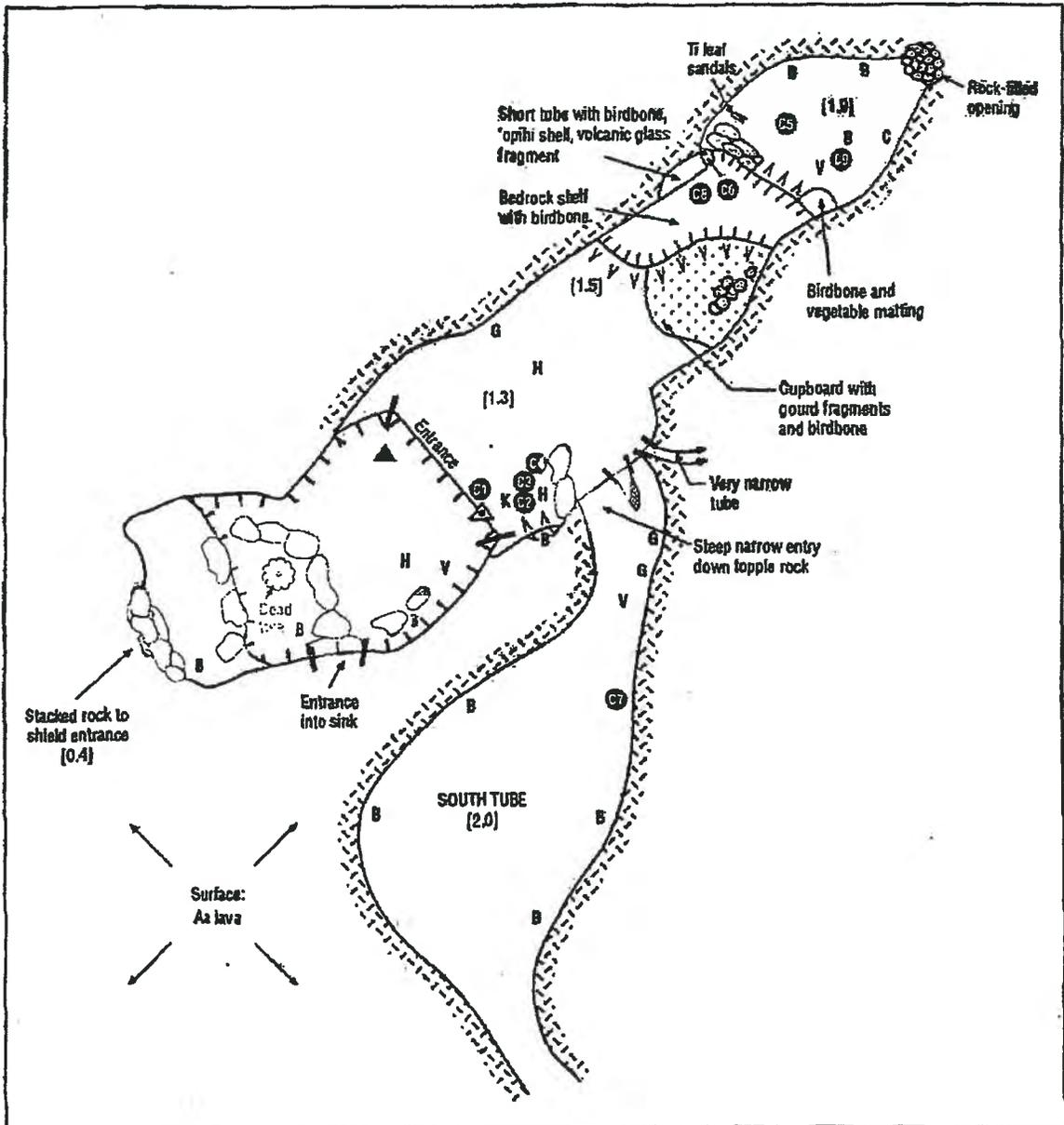
 Work Area 2 boundary

 Archaeology site

Source: USGS 7.5' Ahuinoa, HI (1982)

USGS 7.5' Puu Koli, HI (1982)

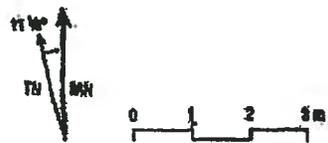




**Legend**

- |                             |                             |                        |
|-----------------------------|-----------------------------|------------------------|
| ▲ Site identification tag   | ✕ Entrance                  | B Birdbone             |
| ▲ Mapping datum (Maio tree) | ✕ Bedrock shelf             | C Charcoal             |
| ⤵ Sink edge                 | ⬢ Rocks, cobbles, boulders  | G Gourd fragment       |
| ⤵ Tube wall                 | ⊙ Sample/artifact collected | H Hammerstone          |
| [0.0] Ceiling height (m)    | ⊙ Midden area               | K Kokoi nut            |
|                             |                             | V Volcanic glass piece |

**Figure 12.**  
Map of Feature C at Site 19490.



The northeast end of the main tube is blocked with boulders and large rocks. This rear area contains scattered charcoal and bird bone (e.g., *Pterodroma phaeopygia*), especially concentrated along the wall crevices. Along the south wall is a midden area (2 × 2 m) on the soil floor containing 'opihi shell, kukui nut pieces, charcoal flecks, bird bone, and volcanic glass. A charcoal sample (Sample C9) from a burned firebrand in this region 9.3 m inside the tube produced a C<sup>13</sup> corrected radiocarbon age of 160 ± 70 years B.P. and calibrated date of A.D. 1640 to 1950 (Appendix D).

Two, small, adjacent openings from the main tube lead down a narrow toppled rock entry into a south chamber (10 × 5 × 2 m high). A continuous surface distribution of cultural debris is noted throughout the lower tube surface (e.g., bird bone, a few firebrands, vegetable matings, gourd fragments, and a volcanic glass blade). Bird bone and gourd fragments are especially concentrated along the wall crevices.

Collected items from Feature C include fish bone and bird bone samples, charcoal, volcanic glass, and a grinding stone and pestle (see below). Two pieces of artifact glass were submitted for source analysis (Appendix E) and were found to be characteristic of the Pohakuloa Basalt/Glass chemical group (cf. Jackson and Miksicek 1994).

- Feature D Feature D is a small blister shelter (ca. 3.3 × 2 × 1 m high) containing bird bone and two volcanic glass fragments. Two aa rocks are placed along the entrance to provide a step down onto the interior floor.
- Feature E Feature E is a small tube (4 × 2 × 1 m high) located 25 m east of Features A through D. Its cultural elements include an ash concentration and a volcanic glass blade. A basalt hammerstone was found about 3 m outside the tube on a mixed lava surface. Recent military debris (e.g., ammunition boxes) littered the vicinity.
- Feature F Feature F is a short trail (ca. 23.5 m long) through aa in the west site region (Figure 14). It is visible from the lava tubes (Features A through D) and is located 62 m west of Feature A. The trail is constructed of pahoehoe slabs (averaging 40 cm in diameter) aligned east-west to provide stepping stones across the aa. Located approximately 10 m south of the trail is a short (1.3 m long by 0.4 m high) stacked wall of pahoehoe slabs of probable recent manufacture as suggested by construction techniques and military debris.
- Feature G Feature G is an *ahu* located on a slight rise about 20 m northeast of Feature E. It is constructed of multiple-stacked aa cobbles and pahoehoe slabs and averages 0.6 m high and wide.

# **EXHIBIT “C”**

H-02191

**Final Report**

**PHASE I ARCHAEOLOGICAL RECONNAISSANCE SURVEY FOR SBCT GO/NO GO  
MANEUVER AREAS AT U.S. ARMY POHAKULOA TRAINING AREA, KA'OHE  
AHUPUA'A, HĀMĀKUA DISTRICT AND PU'UANAHULU AHUPUA'A, NORTH KONA  
DISTRICT, ISLAND OF HAWAI'I, HAWAI'I (TMKs 3-4-4-16:01 and 3-7-1-04:07)**

**Prepared For:**

U.S. Army Engineer District, Honolulu  
CEPOH-EC-E, Building 252  
Fort Shafter, HI 96858-5440

Contract No. DACA83-03-D-0011  
Task Order No. 0001



**Prepared By:**

Garcia and Associates  
146 Hekili St., Suite 101  
Kailua, HI 96734



April 2005

CIVIL NO. 14-1-1085-04 GWBC  
PLAINTIFFS EXHIBIT 25  
IN EVIDENCE FOR IDENTIFICATION  
REC'D \_\_\_\_\_, 2015

CLERK, 14<sup>th</sup> DIVISION

GANDA Report No. 2051-1

EXHIBIT "C"

002226

T315 (Figure 4). The number of military features which are actually within the current project area, however, cannot be ascertained from their report. According to Langlas *et al.* (1999:ii), military features consist primarily of small c-shape shelters and walls. Military refuse and bullet casings were found in association with these features. Features were assessed as "not significant and not eligible for listing on the National Register of Historic Places (NRHP)."

The portion of the current project area within Training Area 6 is relatively close to three previously recorded sites (5002, 5003, and 14638; see Figure 4). Site 5002 consists of several sections of stone wall to the south and east of Training Area 6. These walls were probably built for cattle by Parker Ranch late in the nineteenth century (Welch 1993:47). Site 5003 is a cave shelter to the northeast of Training Area 6 (Bayman *et al.* 2001:26-31). Volcanic glass was observed both inside and outside the cave by Welch in 1990 (Welch 1993:47-51). Excavation by Welch (1993) produced lithic material and midden within stratified deposits. Test excavation confirmed that the cave had previously been utilized by Hawaiians, probably sometime after A.D. 1630 (Welch 1993:81). Later investigation by the University of Hawai'i produced similar information, but returned somewhat earlier dates (2 $\sigma$  calibrated A.D. 1618-1681 and A.D. 1444-1636). Site 14638 is a "Lithic Workshop Complex" south of Training Area 6 (Bayman *et al.* 2001:11-20). It covers an 18 by 38 m area and is comprised of volcanic glass nodules, basalt flakes, basalt adze preforms, bird bone, stone enclosures, and lava blisters (Welch 1993:52; Bayman *et al.* 2001:11). The University of Hawai'i Field School excavated a hearth feature at this site which returned a 2 $\sigma$  calibrated range of A.D. 1405-1531.

#### 2.4.1 Discussion

Various researchers have developed pre-Contact land-use interpretations for PTA and the Saddle Region generally (Athens and Kaschko 1989, Ciegorn 1998, Hommon and Ahlo 1983, Streck 1992, Williams 2002).

Hommon and Ahlo (1983:57) suggest that the Saddle Region was likely used on a temporary basis by travelers passing through the region on one of two travel "corridors"; one following the North Kona-Hamakua District boundary and one following the route of the current Saddle Road. The travel corridors likely facilitated the distribution of Mauna Kea adze blanks and occupation sites were predicted to occur in greater numbers within these corridors. Activities in the Saddle were focused on specific resource procurement such as hunting of 'u'au for food, hunting of honeycreepers for feathers, and local procurement of volcanic glass. Occupation of sites was likely on a seasonal basis by a very small population.

Athens and Kaschko (1989:89) later interpreted Saddle Region land-use intensity patterns to reflect the development of a complex stratified social organization on Hawai'i Island characteristic of the Expansion Period as defined by Kirch (1985:303-305) and in accord with Hommon's (1986) inland expansion hypothesis. As such, land-use in the Saddle Region corresponded with demand for elite goods such as feather adornments and food delicacies such as the immature 'u'au. Hammett and Shideler (1991:42) suggest a burst of such activities associated with the reign of 'Umi-a-Loa.

Subsequent declines in the intensity of human use of the region may correlate with over-exploitation of bird populations (Athens and Kaschko 1989:90), over-exploitation of other upland resources (stone tools, forest products), changes in sociopolitical structure, and decreased demand for Saddle Region resources (Streck 1992:106).



Figure 30. GANDA Site 126, view to southeast.

**GANDA Site: 127**

Site 127 is a pit complex composed of three excavated *pāhoehoe* pits in Training Area 19. (Figure 31). One pit was located with GPS. No cultural materials were observed.

The pit complex may have been utilized for bird hunting by Hawaiian hunters in pre-Contact or early historic times. Detailed mapping is recommended for these sites as well as sampling of any deposits found within the pits.

*Feature 1* is a single *pāhoehoe* pit measuring 1.6 by 1.0 m. Cobbles are loosely piled along the western portion of the feature.

*Features 2 and 3* are *pāhoehoe* pits situated approximately 100 m east of Feature 1. Feature 2 measures 1.5 m in diameter and Feature 3 is .8 m in diameter. Cobbles have been loosely piled on the western flank of the pit.

**GANDA Site: 128**

Site 128 is a cave located at the northern end of Training Area 16 (Figure 32). The cave is formed at the basal margin of a sink. The cave opening measures 4.1 m wide by 1.0 m high and faces east. A large amount of military debris was observed on the surface at the entrance.

Although there is no clear evidence of traditional Hawaiian or early historic cultural modification, the cave is quite suitable for a temporary shelter and appears to have moderately good

excavation potential. Since it is known that such geologic features have a higher than average likelihood of containing traditional Hawaiian cultural remains, it is recommended that Site 128 be fully mapped and photographed. Furthermore, the cave interior should be intensively investigated for cultural remains. If remains are found, test excavation should be performed.

#### **GANDA Site: 129**

Site 129 is a lithic scatter situated on the lower eastern slope of Pu'u Ke'eke'e within Training Area 16 (Figure 33). The scatter is in an exceptionally disturbed area. It is near a dirt road that leads into the *pu'u* and is just downslope from a military defensive position. Military debris was also observed in the area.

The scatter consists of five waterworn pebbles and one possible scoria abrader. These materials clearly do not match the surrounding geology and must have been imported to the site. It is unclear, however, when this happened and by whom. It is therefore recommended that Site 129 be further investigated. Future work should include intensive inspection of the surrounding 20 m area, mapping, and test excavation if further evidence of cultural activity is found. The possible scoria abrader should be examined by a lithic specialist.



Figure 33. GANDA Site 129, view to northwest.

# **EXHIBIT “D”**



REPLY TO  
ATTENTION OF:

**DEPARTMENT OF THE ARMY**  
HEADQUARTERS, UNITED STATES ARMY GARRISON, HAWAII  
DIRECTORATE OF PUBLIC WORKS  
947 WRIGHT AVENUE, WHEELER ARMY AIRFIELD  
SCHOFIELD BARRACKS, HAWAII 96857-5013

## **ENVIRONMENTAL BASELINE SURVEY**

For  
Return of a Portion of Lands Leased from the State of Hawaii  
(State Lease #S-3849)  
Pohakuloa Training Area, Hawaii

November 2012

*Prepared for:*

Real Estate Branch  
Planning Division  
Directorate of Public Works  
U.S. Army Garrison, Hawaii

*Prepared by:*

Environmental Division  
Directorate of Public Works  
U.S. Army Garrison, Hawaii

**EXHIBIT "D"**

CIVIL NO. 14-1-1085-04 GWBC  
PLAINTIFFS **EXHIBIT 34**  
IN EVIDENCE FOR IDENTIFICATION  
REC'D \_\_\_\_\_, 2015

CLERK, 14<sup>th</sup> DIVISION

**SUBJECT: EBS for Return of a Portion of Lands Leased from the State of Hawaii  
(State Lease #S-3849), Pohakuloa Training Area, Hawaii**



**Photo IR-2.6 mi: Blank Ammunition. Small arms blank ammunition observed close to Gate SR-2.**

**SUBJECT: EBS for Return of a Portion of Lands Leased from the State of Hawaii (State Lease #S-3849), Pohakuloa Training Area, Hawaii**



**Photo MKT-2.9 mi: Blank Ammunition. A small amount of blank ammo observed at this location very close to Gate 4 off new Saddle Road.**

# **EXHIBIT “E”**

**Final**  
**First Five-Year Review**  
**Pohakuloa Training Area**  
**Landfills 1 and 2 (POTA-03 & 06)**  
**ISLAND OF HAWAII**

**October 2014**



**U.S. Army Environmental Command**  
**2450 Connell Rd., Building 2264**  
**Fort Sam Houston, Texas 78234-7664**



**Directorate of Public Works**  
**United States Army Garrison, Hawaii**  
**948 Santos Dumont Avenue**  
**Building 105, Wheeler Army Airfield**  
**Schofield Barracks, Hawaii 96857-5013**

**Contract No.: W91ZLK-05-D-0009**  
**Delivery Order 0004**

P000170

CIVIL NO. 14-1-1085-04 GWBC  
**PLAINTIFFS** **EXHIBIT 31**  
IN EVIDENCE FOR IDENTIFICATION  
REC'D \_\_\_\_\_ 2015

**EXHIBIT "E"**

CLERK 14<sup>th</sup> DIVISION

Table 4-1b: POTA-06 Landfill 2  
Summary of Inspections During the Review Period

B. Type of Waste			
7/13/2009	X	n/a	
9/30/2009	X	n/a	
1/29/2010	X	n/a	
4/6/2010	X	n/a	
7/7/2010	X	n/a	
3/25/2011	X	n/a	
6/23/2011	X	n/a	
9/8/2011	X	n/a	
4/17/2012	X	n/a	
9/6/2012	X	n/a	
3/28/2013	X	n/a	
9/13/2013	X	n/a	
V. Additional Observations			
7/13/2009	X	Permanent gas vent identification tags/markers need to be attached to each gas vent	Next Inspection
9/30/2009	X	Permanent gas vent identification tags/markers attached to each gas vent and gas vents painted	9/30/2009
1/29/2010	X	Identification tage on gas vents	
4/6/2010	X	Identification tage on gas vents	
7/7/2010	X	None	
3/25/2011	X	None	
6/23/2011	X	None	
9/8/2011	X	Project sign fastener detached. Reattached	9/8/2011
4/17/2012	X	None	
9/6/2012	X	Re-secured project sign and replaced fence cap.	9/6/2012
3/28/2013	X	Observed possible UXO while performing inspection of fence. Informed Range Control. Changed PM contact info on project sign.	3/29/2013
9/13/2013	X	None	

P000124

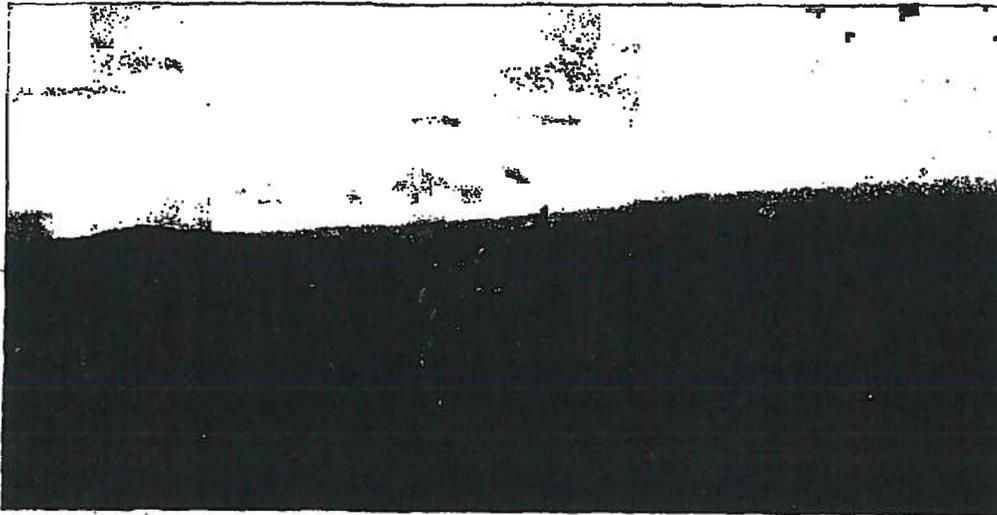
# **EXHIBIT “F”**

H-02196

GANDA Project 2049

**FINAL**

**PHASE II ARCHAEOLOGICAL RESEARCH OF PROPOSED  
BATTLE AREA COMPLEX (BAX) & ANTI-ARMOR LIVE FIRE  
AND TRAINING RANGE (AALFTR) TRAINING AREAS FOR  
STRYKER BRIGADE COMBAT TEAM (SBCT) U.S. ARMY  
POHAKULOA TRAINING AREA,  
ISLAND OF HAWAII, HAWAII (TMK 3-4-4-16:1)**



**Prepared for:**

U.S. Army Engineer District, Honolulu  
CEPOH-EC-E, Building 252  
Fort Shafter HI 96858-5440



CONTRACT No. DACA83-01-D-0013  
Task Order No. 0014

**Prepared by:**

Garcia and Associates  
146 Hekili St., Suite 101  
Kailua, HI 96734

April 2006



CIVIL NO. 14-1-1085-04 GWBC  
**PLAINTIFFS** **EXHIBIT 26**  
IN EVIDENCE FOR IDENTIFICATION  
REC'D \_\_\_\_\_, 2015

CLERK, 14<sup>th</sup> DIVISION

**EXHIBIT "F"**

**002625**

#### Williams (2002)

An archaeological Phase I survey was conducted by Ogden of approximately 1,183 acres east of Redleg Trail (see Figure 9) and Phase II excavations of sites previously identified south and east of the survey area (Williams 2002). A total of 35 sites were identified, including pre-Contact habitation sites, excavated pits, shrines, cairns, and newly identified volcanic glass quarries (termed "chill glass"). The volcanic glass quarries, numbering over 197 individual quarries, were grouped into separate site numbers according to spatial associations between the features. Four of the volcanic glass quarry sites (Sites 21667, 21669, and 21670 and 21671) overlap the eastern portion of AALFTR and AALFTR Extension. Subsurface testing was conducted at Site 18673, located in the current project area. The site was previously recorded by Shapiro *et al.* (1998) prior to the Williams (2002) study. Williams notes the site deposit was thin, except in intact hearths near the entrance, and contained bird bone, gourd fragments, volcanic glass, and charcoal.

#### Shapiro *et al.* (1998)

BioSystems conducted an archaeological survey and aerial reconnaissance of a 1,000-m-wide corridor centered on Redleg Trail (see Figure 9) (Shapiro *et al.* 1998). The survey identified ten sites in the corridor, evaluated as pre-Contact Hawaiian sites associated with habitation (lava tubes and C-shape), ceremony or burial, transportation (trail) and quarrying of basalt material. Two of the habitation sites are within the current project area (Sites 18671 and 18673). Site 18671 is a small lava tube shelter with a scant cultural deposit near the light zone. Datable material collected from the light zone and inner chamber of the lava tube produced respective, calibrated date ranges of AD 1630 to 1955 and AD 1478 to 1680. Site 18673 is an extensive lava tube system with several internal features (e.g., hearths, alignments, clearings and rock uprights) denoting sleeping, cooking and ceremonial areas. Abundant cultural material was collected from the site, including hearth ash and charcoal, burned wood, grass matting, gourd pieces, a sling stone or bird cooking, and a volcanic glass "blade", 'opihi shells and bird bone. Three charcoal samples collected from three areas of the site produced different calibrated date ranges spanning between AD 1280 and 1680.

#### Shapiro and Cleghorn (1998)

BioSystems conducted an archaeological survey of two areas at PTA (Shapiro and Cleghorn 1998). One of the study areas (Work Area 2) included Training Area 5, which overlapped the northeast corner of BAX (see Figure 9). Only one site (Site 19490) was identified in the BAX. Site 19490 is a pre-Contact complex of features (Features A-E), including four lava tubes, two trails, a C-shape, four *ahu* and a surface scatter of volcanic glass flakes. Abundant cultural material was identified in the lava tubes, particularly Feature C, including two *ti* leaf sandals, gourds, burned wooden poles, a hammerstone, vegetable matting, bird and fish bone, 'opihi shell, *kukui* shell and volcanic glass. Military debris was also noted on the surface of the site. Charcoal from a burned firebrand in Feature C produced a calibrated date range of AD 1640 to 1950. A sample of volcanic glass also collected from Feature C was analyzed as material characteristic of the Pohakuloa Basalt/Glass (Hawaii) chemical group (cf. Jackson and Miksicek 1994).

#### Phase I Survey; Roberts *et al.* (2004a)

GANDA conducted a Phase I survey and identification of all sites in the BAX and AALFTR portions of the project area (see Figure 9) (Roberts 2004a). The Phase I work originally identified 24 potential archaeological sites, 15 of which were determined to be archaeological sites during the current Phase II work (see Table 1). All 15 sites are pre-Contact sites attributable to habitation, quarrying, possible bird hunting and travel (trails).

## 5.0 FIELD METHODS

Intensive archaeological survey of the three study areas focused on data collection necessary to evaluate site significance and to determine mitigation treatments for significant cultural resources. Tasks included preparation of detailed site descriptions, drawing of scaled and gps-generated site maps, limited excavations (where possible) and photographic documentation.

Due to the presence of unexploded ordnance in the various study areas, the field crew was accompanied by a team of UXO specialists from Donaldson Enterprises, Inc (DEI) during all field activities. Prior to subsurface testing, the ground was tested for buried UXO with a magnetometer.

All aspects of the fieldwork, including schedule, personnel, archaeological findings and evaluations, were documented in a daily log. Sites were thoroughly recorded on site and feature record forms specifically designed for PTA. Most of the newly recorded sites were mapped to scale using a meter tape and declinated compass. Scale maps were created for a representative number of features at the excavated pit complexes (Sites 23621, 23463, and 23622). All of the volcanic glass quarries were mapped using a gps and are displayed on GIS maps included in this report. Scale maps of representative features in Site 23455 were completed during a previous study (See Appendix C in Roberts et al. 2004b). Digital and 35mm photographs were taken of all the sites.

Test units were excavated at several sites to assess the nature and depth of cultural deposits and to collect datable samples for radiocarbon dating. The test units were excavated by natural soil layers, within 10-cm arbitrary levels. Excavated materials were screened through 1/8-inch mesh. Subsurface cultural features were fully exposed, drawn to scale, bisected if necessary, and profiled. At least two walls were profiled of each excavation unit and descriptions of soils and sediments were recorded following U.S. Soil Conservation Service standards and munsell color notations. Photographs were taken of all subsurface features, profiles, and plan views.

## 6.0 RESULTS

The following section provides descriptions, testing results and radiocarbon information (if applicable) for the 24 sites currently documented in the project area (Figures 10 and 11; see Table 3).

All 24 sites are classified as pre-Contact Hawaiian sites attributable to short-term habitation, possible bird hunting, quarrying, and transportation. All cultural material collected from the sites are tabulated and provided in the Laboratory Analysis Section 7.0 of this report. Sites are presented below by individual study areas (BAX, AALFTR, and AALFTR Extension) and organized - in numerical order - by their State site number, prefaced by 50-10-31. Each description contains a header table providing a brief summary of the site including possible significance evaluations according to NRHP criteria defined in Section 9.0 of this report.

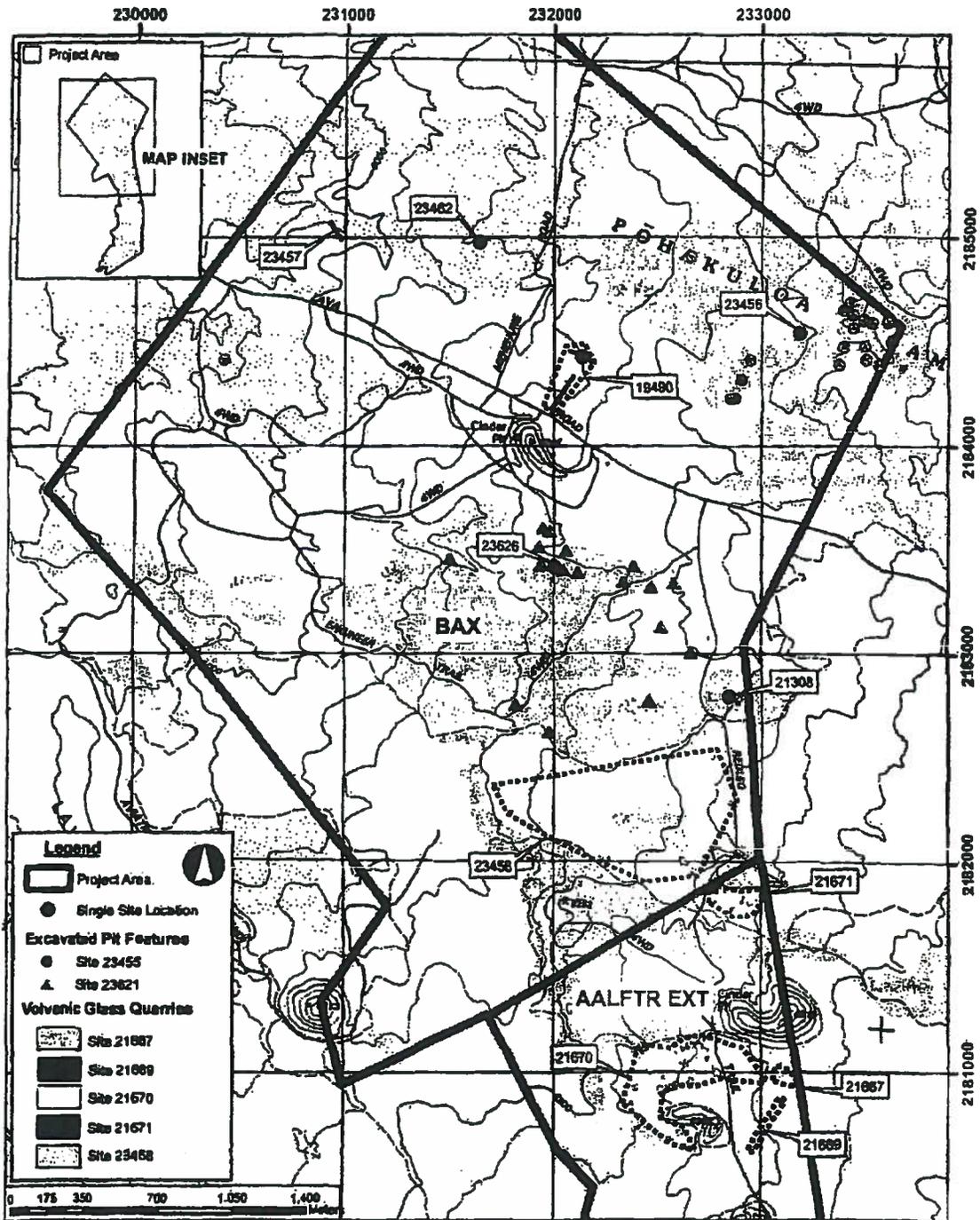


Figure 10. USGS 7.5 Minute Puu Koli Quad Showing Site Locations in Northern Portion of Project Area

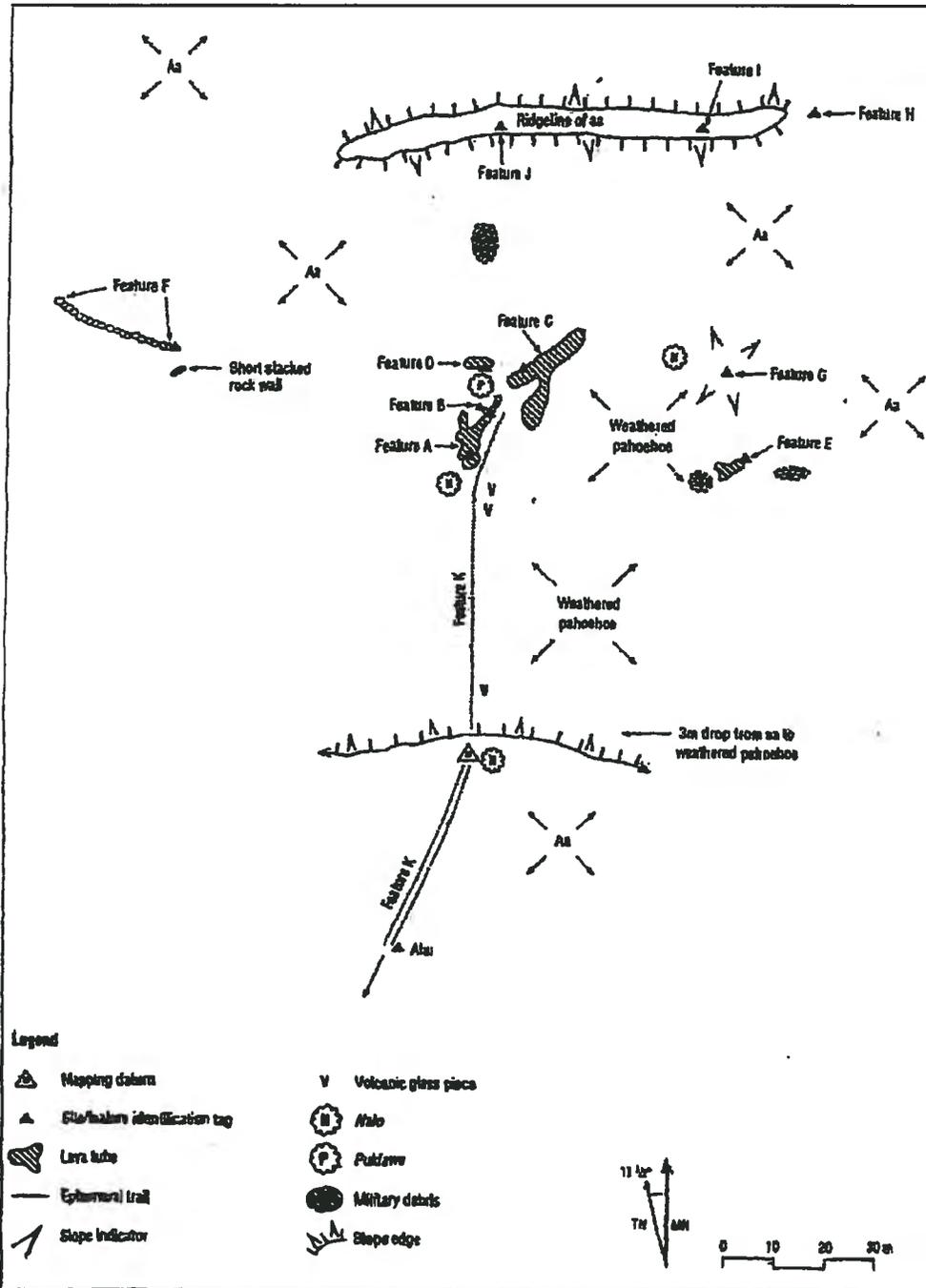


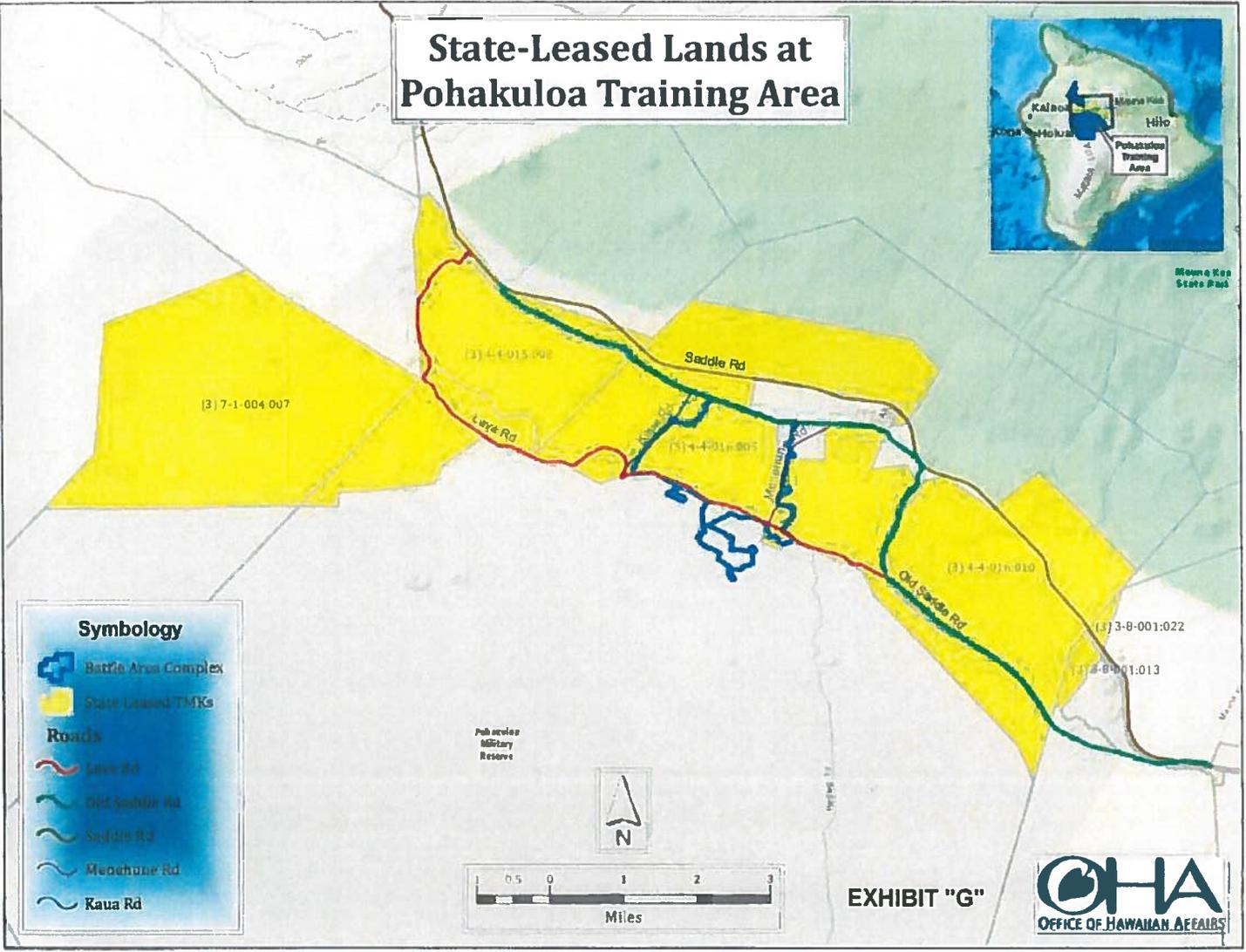
Figure 12. Plan View of Site 19490 Complex (From Shapiro and Cleghorn 1998)

# **EXHIBIT “G”**

# State-Leased Lands at Pohakuloa Training Area



Moorea Sea State Park



**Symbology**

- Battle Area Complex
- State Leased TSMs

**Roads**

- Lays Rd
- Old Saddle Rd
- Saddle Rd
- Moehune Rd
- Kaua Rd

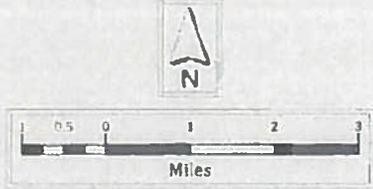


EXHIBIT "G"



# **EXHIBIT “H”**

PERMISSION TO COPY DENIED, HRS 606.13, etc.

IN THE CIRCUIT COURT OF THE FIRST CIRCUIT

STATE OF HAWAII  
Intermediate Court of Appeals  
CAAP-18-0000432  
25-JUL-2018

02:59 PM

CLARENCE CHING and MARY MAXINE	)	
KAHAULELIO,	)	
	)	
Plaintiffs,	)	
v.	)	Civil No.
	)	14-1-1085-04 (GWBC)
SUZANNE D. CASE, in her official	)	
capacity as Chairperson of the	)	
Board of Land and Natural Resources)	)	
and State Historic Preservation	)	
Officer, BOARD OF LAND AND NATURAL	)	
RESOURCE; DEPARTMENT OF LAND AND	)	
NATURAL RESOURCES,	)	
Defendants.	)	

TRANSCRIPT OF PROCEEDINGS

before the HONORABLE GARY W. B. CHANG Judge, 14th Division, presiding, on Wednesday, September 30, 2015.

FURTHER JURY-WAIVED TRIAL

APPEARANCES:

DAVID FRANKEL, ESQ.  
SUMMER SYLVA, ESQ.  
For the Plaintiffs

DANIEL MORRIS, ESQ.  
For the State

NIKKI BEAVER CHEANG, CRR, CSR-340  
OFFICIAL COURT REPORTER  
STATE OF HAWAI'I

1           A.       Well, from our maps, uh-huh.

2           Q.       I want to ask you about what you saw on the  
3 land the State leases at Pohakuloa to the U.S., just  
4 that area, okay, the area north of Lava Road.

5           A.       Right.

6           Q.       Okay.  Actually, before I go there -- well,  
7 other than the cultural sites that you saw, what did you  
8 see on the land the State leases at Pohakuloa to the  
9 U.S.?

10          A.       Other than the cultural --

11                   THE COURT:  Can you be more specific, what  
12 area of land you're talking about.

13

14 BY MR. FRANKEL:

15          Q.       Sure.  This area north of Lava Road.

16          A.       Mm-hm.

17          Q.       East of Kaua Road and west of Menehune  
18 Road, and south of the blue line that's parallel to  
19 Saddle Road, and that area's all marked in yellow on  
20 this map; right?

21          A.       Yes, yes.

22          Q.       And maybe I'm going to include a little bit  
23 east of Menehune Road where the blue goes a little  
24 farther east of Menehune Road.

25          A.       Okay.

1 Q. Is that clear what I'm talking about?

2 A. Yeah, I think so.

3 Q. So other than historic and cultural  
4 sites --

5 A. Mm-hm.

6 Q. -- what did you see in this area?

7 A. Well, basically the construction going on,  
8 which is what we were monitoring as well, and you know,  
9 Army stuff.

10 Q. Be more descriptive about the Army stuff.  
11 What Army stuff did you see on the ground there?

12 A. Oh, on the ground, um, well, spent Army  
13 things, rounds and munitions and unexploded ordinance  
14 and things like that.

15 Q. Where did you see this unexploded  
16 ordinance?

17 A. All over.

18 Q. Can you describe the age of the debris that  
19 you saw.

20 A. I mean, what I can say is that, you know,  
21 you would have anything from new stuff. You can tell  
22 because it's not oxidized, and then old stuff which is  
23 oxidized, you know, it kind of rusted and things like  
24 that, I mean, yeah, all different ages.

25 Q. Who is in the field with you?



# Land Retention Estate Assumptions



## Appendix H

# LAND RETENTION ESTATE ASSUMPTIONS AND DIFFERENCES

As noted in **Section 2.3**, for analysis purposes, this Environmental Impact Statement assumes:

- The U.S. Government would retain the State-owned land at no less than an equitable, fair market value.
- Ongoing activities would be permitted within the conservation district. This assumes the State would accept a petition for a rule amendment and authorize a special subzone in the conservation district under Hawai'i Administrative Rules Section 13-5-16. This would allow military and conservation uses of the State-owned land retained by the Army (see **Section 1.4.2**).
- There would be no difference in ongoing activities in the State-owned land retained under the land retention estates selected for analysis (i.e., fee simple title, lease, easement).
- A new lease or easement for the State-owned land would include similar conditions as the current lease, except for removal of conditions that are no longer relevant (e.g., lease paragraphs 11 and 12), inclusion of the State's standard conditions and references to state and federal regulations in existence at development of a new lease or easement, and inclusion of assumed Army obligations based on State requirements in the Court-Ordered Management Plan (COMP) for the Department of Land and Natural Resources to inspect Army compliance with the lease.
- A new lease or easement would be at least 25 years.
- The Army would adhere to applicable State processes/administrative requirements (e.g., administrative rule changes to establish a new subzone with military uses in the conservation district per Hawai'i Administrative Rules Chapter 13-5) under a new lease or easement.
- Ongoing activities, lease/easement conditions, assumed Army obligations based on State requirements in the COMP, and applicable State processes/administrative requirements would be the same under lease and easement.

Consequently, the only difference between retention via fee simple title and retention via a new lease or easement is that under a new lease or easement the Army would adhere to lease/easement conditions, assumed Army obligations due to State requirements in the COMP, and applicable State processes/administrative requirements. Because ongoing activities, lease/easement conditions, assumed Army obligations due to State requirements in the COMP, and applicable State processes/administrative requirements would be the same under lease and easement, the impacts for lease and easement would be the same; therefore, this Environmental Impact Statement analyzes only fee simple title and lease.

If the Army were to retain the State-owned land via lease, then it is assumed the Army would be held to a new lease that contains similar conditions as the current lease except for the changes noted above;

therefore, it is assumed there would be no substantial change from current Army and State rights, requirements, and limitations under a new lease. Alternatively, if the Army were to retain the State-owned land via fee simple title, then the Army would not be held to the conditions of a new lease or assumed Army obligations based on State requirements in the COMP; however, the Army would still conduct many of the same actions as in the current lease conditions due to current Army environmental protection policies, plans, and requirements as well as current environmental laws.

Because it is assumed Army and State rights, requirements, and limitations in a new lease and assumed Army obligations due to State requirements in the COMP would not change substantially if the State-owned land were to be retained via lease, **Table H-1** presents assumed changes in Army and State rights, requirements, and limitations and assumed Army obligations due to State requirements in the COMP if the State-owned land were to be retained via fee simple title. The table groups current lease conditions and assumed Army obligations based on State requirements in the COMP into categories (i.e., State rights, State requirements, limitations on training, Army requirements, and assumed Army obligations due to State requirements in the COMP) for ease of comprehension of the potential differences. The table does not present lease administrative conditions, such as lease length, lease termination, and lease dispute processes, because these conditions would have no impact on the State's rights or the environmental resources analyzed in the Environmental Impact Statement. The first column of the table summarizes the current lease conditions (the paragraph number within the current lease where the specific lease condition is found is provided in parentheses) and assumed Army obligations based on State requirements in the COMP. The second column of the table indicates whether the Army or State right, requirement, limitation, or assumed obligation would still apply or be met under fee simple title and the associated justification. The third column of the table indicates whether there would be a difference in potential impacts on the current environment (i.e., change from existing conditions of the natural, cultural, and human environment) between retention via lease and fee simple title and the associated justification.

Note that **Table H-1** only addresses State-owned land retained. Army and State rights, requirements, and limitations in the lease (including the 2010 lease amendment) and assumed Army obligations based on State requirements in the COMP would not apply for any State-owned land not retained; therefore, the potential impacts from State-owned land not retained would differ from the State-owned land retained.

**Table H-1: Current Lease Conditions and COMP Requirements Compared to Retention via Fee Simple Title**

<b>Pōhakuloa Training Area 1964 Lease and 2010 Lease Amendment Conditions and Assumed Army Obligations based on State Requirements in the COMP</b>	<b>Would State or Army Right, Requirement, Limitation, or Assumed Obligation Still Continue Under Fee Simple Title?</b>	<b>Would There Be a Difference in Potential Impacts on the Current Environment Between Retention via Lease and Fee Simple Title?</b>
<b>State Rights (1964 Lease and 2010 Lease Amendments)</b>		
Army shall obtain written consent of the State prior to certain construction (10)	No. The Army would no longer be subject to this administrative requirement.	No. There would be no difference in potential impacts on the current environment due to the loss of this State right/administrative requirement.
State can erect signs and construct capital improvements (water conservation, public water consumption, forestry, recreation) at locations mutually agreed by both parties (16)	No. The State would lose its right to erect signs and construct capital improvements.	No. There would be no difference in potential impacts on the current environment due to the loss of this State right.
State has the right to construct a road along a mutually agreeable route through the northerly portion of Parcel C (17)	No. The State would lose its right to construct a road along a mutually agreeable route through the northerly portion of Parcel C.	No. There would be no difference in potential impacts on the current environment due to the loss of this State right.
State has the right to enter State-owned land to conduct operations that would not interfere with Army activities (19)	No. The State would lose its right to enter and conduct activities in the State-owned land retained.	No. There would be no difference in potential impacts on the current environment due to the loss of this State right.
State has the right to use roads and trails within the State-owned land (20)	No. The State would lose its right to use U.S. Government-owned roads and trails in the State-owned land retained. The Army would allow the roadway easement for the Daniel K. Inouye Highway to remain in place.	Yes. The State rarely uses U.S. Government-owned roads and trails in the State-owned land, but there would be a difference in potential impacts on the environment due to the loss of State use of the U.S. Government-owned roads and trails under fee simple title.

**Table H-1: Current Lease Conditions and COMP Requirements Compared to Retention via Fee Simple Title**

<b>Pōhakuloa Training Area 1964 Lease and 2010 Lease Amendment Conditions and Assumed Army Obligations based on State Requirements in the COMP</b>	<b>Would State or Army Right, Requirement, Limitation, or Assumed Obligation Still Continue Under Fee Simple Title?</b>	<b>Would There Be a Difference in Potential Impacts on the Current Environment Between Retention via Lease and Fee Simple Title?</b>
State has groundwater, surface water, ores, and mineral rights. Army has right to use coral, rock, and similar materials. Army has right to use groundwater and surface water. (22) (Includes 2010 lease amendment text)	No. State would lose rights to groundwater, surface water, ores, and mineral rights on, in, or under the State-owned land retained. The Army would gain rights to ores and minerals on, in, or under the State-owned land retained.	No. There would be no difference in potential impacts on the current environment due to change in these rights.
State has the right to grant rights or privileges to others, consistent with the lease (27)	No. The State would lose its right to let others use the State-owned land retained.	No. There would be no difference in potential impacts on the current environment due to the loss of this State right.
<b>State Requirements (1964 Lease and 2010 Lease Amendments)</b>		
State will take reasonable action to remove or bury solid waste resulting from public use of the State-owned land (18)	No. The State would no longer be responsible for disposing of solid waste from the public on State-owned land retained.	No. There would be no difference in potential impacts on the current environment due to transfer of this responsibility from the State to the Army.
<b>Limitations on Training (1964 Lease and 2010 Lease Amendments)</b>		
Fire all combat weapons into the impact area (7)	Yes. Army would continue to fire into the existing impact area.	No. There would be no change in Army firing into the impact area; therefore, there would be no difference in potential impacts on the current environment.
Stockpile supplies and equipment orderly and away from established roads or trails (9)	Yes. Army would continue current practices for stockpiling supplies and equipment in designated areas such as the Ammunition Supply Point, Ammunition Holding Areas, and storage buildings.	No. There would be no change in Army processes for stockpiling supplies and equipment; therefore, there would be no difference in potential impacts on the current environment.

**Table H-1: Current Lease Conditions and COMP Requirements Compared to Retention via Fee Simple Title**

<b>Pōhakuloa Training Area 1964 Lease and 2010 Lease Amendment Conditions and Assumed Army Obligations based on State Requirements in the COMP</b>	<b>Would State or Army Right, Requirement, Limitation, or Assumed Obligation Still Continue Under Fee Simple Title?</b>	<b>Would There Be a Difference in Potential Impacts on the Current Environment Between Retention via Lease and Fee Simple Title?</b>
No vehicles in proximity to the Mauna Kea Recreation Area, currently known as the Gilbert Kahele Recreation Area (10a)	Yes. Army would continue to not permit training, firing, or maneuvering within 1,500 meters of the Gilbert Kahele Recreation Area per the Pōhakuloa Training Area Range Operations Standard Operating Procedures (2022).	No. There would be no change in Army activities within 1,500 meters of the Gilbert Kahele Recreation Area; therefore, there would be no difference in potential impacts on the current environment.
No small arms firing into the State-owned land, except in Parcel A (12)	Yes. Within the State-owned land, the Army would continue to only fire small arms into Parcel A in accordance with Pōhakuloa Training Area Range Operations Standard Operating Procedures (2022).	No. There would be no change in Army small arms firing within the State-owned land retained; therefore, there would be no difference in potential impacts on the current environment.
No live fire within 0.75 mile of the Pōhakuloa Ranger Station (12)	Not Applicable. The Pōhakuloa Ranger Station, formerly located off-installation along Old Saddle Road to the north of the boundary between Training Areas 4 and 6, no longer exists.	No. This lease condition is no longer applicable; therefore, there would be no difference in potential impacts on the current environment.
Avoid destruction of vegetation, wildlife and forest cover, geological features, and related natural resources and improvements; help preserve the natural beauty of the premises; avoid pollution or contamination of ground and surface waters; remove or bury all solid waste (14)	Yes. Army would continue current environmental protection practices per the Integrated Natural Resources Management Plan, U.S. Army Garrison, Pōhakuloa (USAG-HI) External Standard Operating Procedures (2018), and Department of Defense Instruction 4715.23.	No. There would be no change in Army environmental protection practices; therefore, there would be no difference in potential impacts on the current environment.
Avoid damaging cultural/historic resources (15)	Yes. Army would continue to follow federal laws and regulations and would conform to State laws and regulations, to the extent practicable, for cultural/historic resources and the Integrated Cultural Resources Management Plan.	No. There would be no change in Army protection of cultural and historic resources; therefore, there would be no difference in potential impacts on the current environment.

**Table H-1: Current Lease Conditions and COMP Requirements Compared to Retention via Fee Simple Title**

Pōhakuloa Training Area 1964 Lease and 2010 Lease Amendment Conditions and Assumed Army Obligations based on State Requirements in the COMP	Would State or Army Right, Requirement, Limitation, or Assumed Obligation Still Continue Under Fee Simple Title?	Would There Be a Difference in Potential Impacts on the Current Environment Between Retention via Lease and Fee Simple Title?
Cooperate with the State in game development and hunting programs and allow public hunting within the State-owned land (17)	Yes. Army would continue to cooperate with the State and maintain current hunting areas and programs in the State-owned land retained.	No. There would be no change in Army management of hunting areas and programs; therefore, there would be no difference in potential impacts on the current environment.
<b>Army Requirements (1964 Lease and 2010 Lease Amendments)</b>		
Post and maintain signs on roads and trails entering dangerous areas, provided the information on the signs is not incompatible with the lease (5)	Yes. Army would continue to post signs warning of dangerous areas in accordance with Army policies and procedures such as the U.S. Army Garrison, Pōhakuloa (USAG-HI) External Standard Operating Procedures (2018) and the Pōhakuloa Training Area Range Operations Standing Operating Procedures (2022).	No. There would be no change in Army identification of dangerous areas; therefore, there would be no difference in potential impacts on the current environment.
Remove or deactivate live or blank ammunition (9)	Yes. Army would continue removing or deactivating live and blank ammunition upon completion of a training exercise in accordance with the Pōhakuloa Training Area Range Operations Standard Operating Procedures (2022) and the U.S. Army Garrison, Pōhakuloa (USAG-PTA) External Standard Operating Procedures (2018). Army would continue to only be required to cleanup closed ranges.	No. There would be no change in Army processes for removing and deactivating live and blank ammunition; therefore, there would be no difference in potential impacts on the current environment.
Maintain roads to prevent erosion (10)	Yes. Army would continue to adhere to current road maintenance procedures such as in the Integrated Training Area Management program.	No. There would be no change in Army maintenance of U.S. Government-owned roads within the State-owned land retained; therefore, there would be no difference in potential impacts on the current environment.
Maintain a fence along a part of the boundary bordering Parcel C (10a)	Yes. Army would continue to maintain some form of a barrier, such as a two-wire fence, along this portion of the Parcel C boundary.	No. There would be no change in the existence and maintenance of the fence; therefore, there would be no difference in potential impacts on the current environment.

**Table H-1: Current Lease Conditions and COMP Requirements Compared to Retention via Fee Simple Title**

Pōhakuloa Training Area 1964 Lease and 2010 Lease Amendment Conditions and Assumed Army Obligations based on State Requirements in the COMP	Would State or Army Right, Requirement, Limitation, or Assumed Obligation Still Continue Under Fee Simple Title?	Would There Be a Difference in Potential Impacts on the Current Environment Between Retention via Lease and Fee Simple Title?
Minimize interference with traffic on Saddle Road (now known as Old Saddle Road) by limiting stoppages to 15-minute periods (11)	Not applicable. The portion of Old Saddle Road within the State-owned land is no longer publicly accessible.	No. This lease condition is no longer applicable; therefore, there would be no difference in potential impacts on the current environment.
Prevent and fight fires associated with training (13)	Yes. Army would continue to adhere to the Integrated Wildland Fire Management Plan, Standard Operating Procedures Wildland Fire U.S. Army Garrison Pōhakuloa, and U.S. Army Garrison, Pōhakuloa (USAG-HI) External Operating Procedures (2018).	No. There would be no change in fire prevention and fighting within the State-owned land retained; therefore, there would be no difference in potential impacts on the current environment.
Army cannot grant any interest in the land, except for temporary activities or contractors, in which case any land rental shall be covered into the Treasury of the State of Hawaii (26)	No. Army would be able to grant interest in the land and would not be required to pay any land use fees to the State.	No. Army has no plans to grant interest in the State-owned land retained; therefore, there would be no difference in potential impacts on the current environment.
Reforest areas where Army has substantially destroyed forest cover (28)	No. Army would not be required to reforest areas substantially deforested but would continue to manage forested areas and vegetation in accordance with the Integrated Natural Resources Management Plan and Integrated Training Area Management program based on funding availability.	No. Army would retain the State-owned land prior to the end of the current lease under either land retention estate, so Army activities would continue and Army would not reforest deforested areas within the State-owned land retained; therefore, there would be no difference in potential impacts on the current environment.

**Table H-1: Current Lease Conditions and COMP Requirements Compared to Retention via Fee Simple Title**

Pōhakuloa Training Area 1964 Lease and 2010 Lease Amendment Conditions and Assumed Army Obligations based on State Requirements in the COMP	Would State or Army Right, Requirement, Limitation, or Assumed Obligation Still Continue Under Fee Simple Title?	Would There Be a Difference in Potential Impacts on the Current Environment Between Retention via Lease and Fee Simple Title?
Remove signs, remove or abandon in place structures, remove weapons and shells from training to the extent technically and economically capable within 60 days of lease expiration or as mutually agreed (29)	No. Army only would remove or abandon signs and structures as needed to support the mission. Army only would be required to cleanup closed ranges. Army would continue current practices for removing or deactivating live and blank ammunition upon completion of a training exercise in accordance with the Pōhakuloa Training Area Range Operations Standard Operating Procedures (2022) and the U.S. Army Garrison, Pōhakuloa (USAG-PTA) External Standard Operating Procedures (2018).	No. Army would retain the State-owned land prior to the end of the current lease under either land retention, so Army activities would continue and Army would not remove signs, structures, and weapons and shells within the State-owned land retained; therefore, there would be no difference in potential impacts on the current environment.
<b>Assumed Army Obligations based on State Requirements in the COMP</b>		
Army will enable periodic inspections of the State-owned land by Department of Land and Natural Resources and Native Hawaiian Legal Corporation (II[1]).	No. Army would no longer be subject to the COMP or any similar requirements in a new lease.	No. There would be no change in environmental resources from current conditions due to the end of periodic State lease compliance inspections; therefore, there would be no difference in potential impacts on the current environment.
Army will comply with corrective action requirements in the Department of Land and Natural Resources inspection reports (II[5]).	No. Army would no longer be subject to the COMP or any similar requirements in a new lease. Three State inspections to date have identified no corrective action requirements.	No. There would be no change in environmental resources from current conditions due to the end of periodic State lease compliance inspections; therefore, there would be differences in potential impacts on the current environment.

**Table H-1: Current Lease Conditions and COMP Requirements Compared to Retention via Fee Simple Title**

<b>Pōhakuloa Training Area 1964 Lease and 2010 Lease Amendment Conditions and Assumed Army Obligations based on State Requirements in the COMP</b>	<b>Would State or Army Right, Requirement, Limitation, or Assumed Obligation Still Continue Under Fee Simple Title?</b>	<b>Would There Be a Difference in Potential Impacts on the Current Environment Between Retention via Lease and Fee Simple Title?</b>
<p>Army will provide copies of periodic and semi-annual inspection reports of the State-owned land to Department of Land and Natural Resources (II[6]).</p>	<p>No. Army would no longer be subject to the COMP or any similar requirements in a new lease.</p>	<p>No. There would be no change in environmental resources from current conditions due to the end of providing Army inspection reports to the State; therefore, there would be differences in potential impacts on the current environment.</p>

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# Cultural Impact Assessment





**Revised Cultural Impact Assessment Report for the Army Training Land Retention of  
Pōhakuloa Training Area**

**Ka'ohē Mauka Ahupua'a, Hāmākua District and Humu'ula Ahupua'a, North Hilo District**

**TMKs: [3] 4-4-015:008, [3] 4-4-016:005, [3] 3-8-001:013 & 022, and [3] 7-1-004:007**

Prepared by



January 2024

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## Note on Hawaiian Orthography

In keeping with the standard established by Hawaiian scholars<sup>1</sup> who have published vital work in the perpetuation of Hawaiian knowledge, this document does not italicize Hawaiian words. This effort was best articulated by Noenoe Silva in 2004 in her ground-breaking work *Aloha Betrayed*:

I have not italicized Hawaiian words in the text in keeping with the recent movement to resist making the native tongue appear foreign in writing produced in and about a native land and people. Readers will also notice that not all of the Hawaiian text has modern orthography (i.e., the ‘okina to mark the glottal stop and the macron to mark the long vowel). I choose to quote text as is without imposing the marks, which were not developed until the mid-twentieth century. This allows readers literature in Hawaiian to see the original spelling and perhaps glean alternative and/or additional meanings. Particularly for names of people, I conservatively avoid using the marks, except in cases where such spelling has become standards (e.g., Kalākaua) or where the meaning of the name has been explained or is obvious (Silva, 2004).

Hawaiian is both the native language of the pae ‘āina of Hawai‘i and an official language of the State of Hawai‘i. Some reports will leave Hawaiian words italicized if part of a quote; this report does not. In the narrative, the report uses diacritical markings to assist readers, except in direct quotes, in which the markings used in the original text are maintained. Contextual translations are provided when appropriate. A glossary is not provided. Online dictionaries are readily available for use at [www.wehewehe.com](http://www.wehewehe.com).

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<sup>1</sup> See also University of Hawai‘i Style Guide (2021), which states, “In general, do not italicize Hawaiian words (there are exceptions). Hawaiian and English are the two official languages of the State of Hawai‘i. ...”

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# Table of Contents

**EXECUTIVE SUMMARY ..... XV**

**1.0 INTRODUCTION ..... 1**

    1.1 Proposed Action..... 1

    1.2 Regulatory Framework..... 4

        1.2.1 Regulatory Background Under HRS 343.....4

    1.3 Project Area Description ..... 5

        1.3.1 Training Areas, Facilities, Utilities, and Infrastructure .....5

        1.3.2 Project Area and the Broad Geographical Area.....6

    1.4 Limitations of the Study ..... 8

    1.5 Confidential Information Withheld ..... 8

    1.6 Conflicting Information ..... 8

**2.0 METHODOLOGY ..... 9**

    2.1 Archival Research Methods..... 11

        2.1.1 Historical Accounts..... 12

        2.1.2 Historical Maps..... 12

        2.1.3 Previous Ethnographic Studies and Interviews..... 12

        2.1.4 Archaeological and Biological Studies ..... 13

    2.2 Interview Selection and Methods ..... 13

        2.2.1 Public Outreach to Identify Potential Informants ..... 13

            2.2.1.1 Ka Wai Ola..... 13

            2.2.1.2 Social Media ..... 15

            2.2.1.3 Outreach to Specific Organizations and Individuals ..... 15

        2.2.2 Interview Selection Criteria ..... 15

            2.2.2.1 Biographical Information for Interviewees ..... 16

        2.2.3 Interview Procedure and Documentation..... 17

    2.3 Methods for Identification of Cultural Resources, Practices, and Beliefs ..... 18

        2.3.1 Determining Direct or Indirect Significance..... 18

    2.4 Impact Analysis Methods ..... 19

    2.5 Mitigation Recommendation Methods ..... 20

**3.0 CULTURAL CONTEXT ..... 21**

3.1	Mālama ‘Āina.....	21
3.2	‘Ike Ku‘una (Traditional Knowledge).....	21
3.3	Ceremonial Practices and Performances.....	21
3.4	Mo‘olelo .....	23
3.5	‘Inoa ‘Āina (Place Names).....	24
3.6	Kilo (Environmental and Weather-Related Observational Practices) .....	24
3.7	Ka‘apuni (Travel and Trail Usage) .....	24
3.8	Agricultural and Subsistence Practices.....	24
3.9	Traditional Gathering Practices .....	26
3.10	Uhau Humu Pōhaku (Stone Construction) .....	26
<b>4.0</b>	<b>ARCHIVAL RESEARCH AND HISTORY .....</b>	<b>27</b>
4.1	Archival Research .....	27
4.1.1	Natural Environment .....	27
4.1.1.1	Wai.....	27
4.1.1.2	Rains.....	28
4.1.1.3	Winds.....	29
4.1.1.4	Pu‘u .....	29
4.1.1.5	Traditional Plants .....	29
4.1.1.6	Native Birds.....	33
4.1.2	Cultural Landscape .....	36
4.1.2.1	Inoa ‘Āina (Place Names).....	36
4.1.2.2	Mo‘olelo, Oli, and ‘Ōlelo No‘eau.....	40
4.1.2.3	Mele .....	46
4.1.3	Historic Archaeological Sites .....	48
4.1.3.1	Habitation .....	52
4.1.3.2	Quarrying.....	56
4.1.3.3	Stone Tool Manufacture.....	57
4.1.3.4	Uhau Humu Pohaku (Dry Stone Stacking).....	58
4.1.3.5	Parietal Art (Petroglyphs and Petrographs).....	62
4.1.3.6	Trails .....	63
4.2	Archival History .....	65
4.2.1	Traditional Historical Context.....	65
4.2.2	Post-Contact and Kingdom History.....	66

4.2.3	Agricultural and Subsistence History.....	67
4.2.4	Military History .....	69
4.3	Previous Ethnographic Studies .....	70
4.3.1	Langlas et al. (1999).....	71
4.3.1.1	Ritual Sites Previously Identified by Henry Auwae.....	71
4.3.2	Maly (1999).....	72
4.3.3	Maly and Maly (2002).....	73
4.3.4	Maly (2005).....	73
4.3.5	McCoy and Orr (2012).....	73
<b>5.0</b>	<b>ONLINE SURVEY AND INTERVIEWS .....</b>	<b>76</b>
5.1.1	Survey Responses.....	76
5.1.2	Interview Responses .....	77
5.1.2.1	Mr. Kamana Kapele .....	77
5.1.2.2	Dr. Kū Kahakalau.....	77
5.1.2.3	Mr. Carl Sims.....	78
5.1.2.4	Dr. Michelle Noe Noe Wong-Wilson.....	78
<b>6.0</b>	<b>IDENTIFIED CULTURAL RESOURCES, PRACTICES, AND BELIEFS .....</b>	<b>80</b>
6.1	Summary of Data Obtained from Archival Research.....	80
6.2	Summary of Data Obtained from Survey and Interviews.....	80
6.3	Impacts to Cultural Resources, Practices, and Beliefs.....	81
<b>7.0</b>	<b>ACCESS POLICIES .....</b>	<b>82</b>
7.1	Cultural Access .....	82
7.1.1	Cultural Access Discussion .....	82
7.1.2	Access Research .....	83
7.2	Hunting Access.....	83
<b>8.0</b>	<b>ANALYSIS OF IMPACTS FROM THE PROPOSED ACTION AND ALTERNATIVES .....</b>	<b>84</b>
8.1	Alternative 1: Maximum Retention.....	84
8.1.1	Land Retained .....	84
8.1.2	Land Not Retained.....	85
8.2	Alternative 2: Modified Retention.....	85
8.2.1	Land Retained .....	85
8.2.2	Land Not Retained.....	86

**Table of Contents**

---

8.3	Alternative 3: Minimum Retention .....	86
8.3.1	Land Retained .....	86
8.3.2	Land Not Retained.....	87
8.4	No Action Alternative .....	87
<b>9.0</b>	<b>MITIGATION .....</b>	<b>88</b>
9.1	Existing Mitigation and Management Measures .....	88
9.2	Interviewees’ Recommendations .....	88
9.3	Recommendations of the Current Study .....	89
<b>10.0</b>	<b>CONCLUSION .....</b>	<b>90</b>
<b>11.0</b>	<b>REFERENCES .....</b>	<b>91</b>

## **Appendices**

**Appendix A: Individuals and Organizations Contacted**

**Appendix B: Online Survey Questions and Responses;  
Other Comments and Documents Received**

**Appendix C: Interview Questions and Summaries**

## List of Figures

Figure 1. Location .....	2
Figure 2. Project Area and Broad Geographical Area with Ahupua'a.....	3
Figure 3. Project Area with Training Areas and Broad Geographical Area .....	7
Figure 4. Ho'olaha Lehulehu (Public Notice).....	14
Figure 6. 'Ahu'ula (cloak), circa 1800, Hawai'i, maker unknown. Gift of Lord St Oswald, 1912. CC BY-NC-ND 4.0. Te Papa (FE006380) <a href="https://collections.tepapa.govt.nz/object/91240">https://collections.tepapa.govt.nz/object/91240</a> .....	35
Figure 7. Wall, W.A. and Alexander, W.D. (1886) .....	37
Figure 8. Donn, John M. et al. (1901) .....	38
Figure 9. Wall, Walter E. (1928) .....	39
Figure 10. Habitation Cave, U.S. Army Garrison Pōhakuloa Training Area (2012).....	52
Figure 11. Lava tube that was likely used as a shelter, U.S. Army Garrison Pōhakuloa Training Area (2015) .....	53
Figure 12. Gourd found in a historic site located in a lava tube, U.S. Army Garrison Pōhakuloa Training Area.....	54
Figure 13. Cooking stones located in a lava tube habitation site, U.S. Army Garrison Pōhakuloa Training Area (2015) .....	55
Figure 14. Item, speculated to be ho'okupu, an offering, found in a lava tube, U.S. Army Garrison Pōhakuloa Training Area (2015).....	56
Figure 15. Ko'i (hafted adze), 1700s, Hawai'i, maker unknown. Gift of Lord St Oswald, 1912. CC BY-NC-ND 4.0. Te Papa (FE000334) <a href="https://collections.tepapa.govt.nz/object/145329">https://collections.tepapa.govt.nz/object/145329</a> .....	58
Figure 16. Stone platform on Pu'u Koli, located at the south end of Training Area 21, U.S. Army Garrison Pōhakuloa Training Area (2012).....	59
Figure 17. Cattle ranching at Parker Ranch (Hawai'i Island). Hawai'i State Archives, Paniolo Collection, PP-13-6-006 (ca. 1930) .....	68
Figure 18. "Typical Hawaiian Cowboys" – Hawai'i State Archives, Paniolo Collection, PP-13-6-015 (n.d.) .....	69

## List of Tables

Table 1.	Consistency with OEQC Guidelines for Assessing Cultural Impacts (OEQC 2012:12) .....	9
Table 2.	Consistency with OEQC Recommendations for Content (OEQC 2012:13) .....	10
Table 3.	Rain Names with Possible Association to Broad Geographical Area.....	28
Table 4.	Wind Names with Possible Association to Broad Geographical Area.....	29
Table 5.	Native Plants Documented on State-Owned Land .....	30
Table 6.	Protected Plants Documented on Pōhakuloa Training Area .....	31
Table 7.	Federally Listed Endangered or Threatened Animals Observed at Pōhakuloa Training Area.....	33
Table 8.	Names of Pu'u.....	36
Table 9.	Historic and Archaeological Sites on State-owned Land.....	48
Table 10.	Ritual Sites, Burials and Homesteads identified by "Papa" Henry Auwae.....	72
Table 11.	Place Names from 2012 McCoy and Orr Ethnographic Study.....	74
Table 12.	Summary of Findings Made by McCoy and Orr Regarding TCPs at PTA.....	75

## Abbreviations and Acronyms

**A.B.C.F.M.:** American Board of Christian Foreign Missions

**Act 50:** Act 50 Session Laws of Hawaii 2000 or Act 50 SLH 2000

**AMSL:** Above Mean Sea Level

**Article XII, Section 7:** Article XII, Section 7 of the Hawai'i State Constitution

**BPBM:** Bernice Pauahi Bishop Museum

**Ca.:** circa

**CFR:** Code of Federal Regulations

**Ching:** *Ching v. Case*, 449 P.3d 1146 (Haw. 2019)

**CIA:** Cultural Impact Assessment

**DoD:** Department of Defense

**EIS:** Environmental Impact Statement (for the Army Training Land Retention at Pōhakuloa Training Area)

**DKI Highway:** Daniel K. Inouye Highway

**DLNR:** Department of Land and Natural Resources

**EIS:** Environmental Impact Statement

**HAR:** Hawaii Administrative Rules

**Haw.:** Hawaii

**HDOT:** State of Hawaii Department of Transportation

**HEPA:** Hawaii Environmental Policy Act

**HRS:** Hawaii Revised Statutes

***Ka Pa'akai:*** *Ka Pa'akai O Ka 'Āina v. Land Use Commission*, 94 Haw. 31 [2000]

**L.C.A.:** Land Commission Awards

**NARA:** National Archives and Records Administration

**NEPA:** National Environmental Policy Act

**NHO:** Native Hawaiian Organization

**NHPA:** National Historic Preservation Act

**No.:** Number

**NRHP:** National Register of Historic Places

**OEQC:** Office of Environmental Quality and Control

**OHA:** Office of Hawaiian Affairs

**PA:** Programmatic Agreement

**PTA:** Pōhakuloa Training Area

**Pub. L.:** Public Law

**SIHP:** State Inventory of Historic Places

**SLH:** Session Laws of Hawaii

**SOP:** Standard Operating Procedure

**TA:** Training Area

**TCP:** Traditional Cultural Property

**TMK:** Tax Map Key

**UH:** University of Hawaii

**USARHAW:** U.S. Army Hawaii

**U.S.:** United States

**USACE:** United States Army Corps of Engineers

**USAG-HI:** U.S. Army Garrison Hawai'i

**USGS:** U.S. Geological Survey

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## Executive Summary

Group 70, Inc. and Honua Consulting, LLC prepared this Cultural Impact Assessment in support of an Environmental Impact Statement being prepared by the U.S. Army Corps of Engineers, Honolulu District for the U.S. Army Garrison-Hawaii. The Environmental Impact Statement analyzes the environmental and cultural impacts of the proposed retention of up to approximately 22,750 acres of State of Hawai'i (State)-owned land at Pōhakuloa Training Area (PTA).

The main objectives of this Cultural Impact Assessment are to analyze and assess the impact of the Proposed Action, its alternatives, and mitigation measures on cultural practices and features associated with State-owned land (project area) to promote responsible decision making. These objectives are guided by the Office of Environmental Quality Control "Guidelines for Assessing Cultural Impacts" adopted November 19, 1997 (OEQC 2012:11-13). These objectives were achieved by collecting ethnographic data from archival and contemporary resources relevant to the project area to make a good faith effort to identify cultural beliefs, practices, and resources of Native Hawaiians and other ethnic groups associated with the project area.

The results of archival and ethnographic research yielded numerous cultural resources, practices, and beliefs associated with the project area and the broad geographical area. Impacts to cultural resources from the Proposed Action and the continuation of ongoing military activity, as reflected in interviews and surveys, relate to access. Although current access policies exist and allow limited access, they are deemed inadequate by interviewees and survey respondents who desire safe and regular access to the PTA project area to engage in cultural practices in which the 'āina (the land) is a significant contributing resource for various cultural practices and beliefs, including mālama 'āina. Although cultural practices and beliefs are, therefore, somewhat isolated from their setting due to limited cultural access within parts of the PTA project area, this is due to public safety concerns. The continuation of current military activity within portions of the PTA project area would not reduce the number of days when areas can be accessed for cultural activities, and the Army would continue to provide cultural access to cultural resources, but current limitations on access are likely to continue into the foreseeable future.

Additionally, adverse impacts would continue within the PTA project area from the introduction of physical elements that have altered the setting in which cultural practices take place. This is a general concept repeated throughout informants' comments that the Saddle Region itself, including the project area, is a sacred setting, which is altered by the presence of military activity, and in particular, by military activity that continues to adversely impact the landscape. Other impacts discussed by interviewees for the project area, such as physical alteration on cultural resources, are associated with past actions within the project area and are currently mitigated by existing agreements, including the 2018 Programmatic Agreement for PTA (DA 2018).

Recommendations identified or informed by interviewees to avoid, minimize, rectify, or reduce potential impacts from the Proposed Action include formalizing a cultural access request process through consultation with Native Hawaiians and cultural practitioners. This formalized cultural access request process would enable Native Hawaiians and cultural practitioners opportunities to promote and preserve cultural practices, beliefs, and resources. In addition, it is recommended the Army consider options to provide unlimited cultural access to specific locations and resources, determined in consultation with Native Hawaiians and cultural practitioners, associated with cultural practices and beliefs.

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## 1.0 Introduction

Honua Consulting and G70 prepared this Cultural Impact Assessment (CIA) as a part of a larger Environmental Impact Statement (EIS) being prepared by the U.S. Army Corps of Engineers, Honolulu District, that analyzes the environmental and cultural effects of the proposed retention of up to approximately 22,750 acres of State of Hawai'i (State) owned land at Pōhakuloa Training Area (PTA). The CIA was prepared to comply with Hawai'i Environmental Policy Act (HEPA) requirements (Hawai'i Revised Statutes Chapter 343, and Hawai'i Administrative Rules Chapter 11-200.1).

Approximately 100,000 acres of PTA are under the direct ownership or control of the U.S. Army, while approximately 23,000 acres are owned by the State of Hawai'i and have been leased to the Army since 1964. (These lands are referred to in the Environmental Impact Statement as "State-owned land." For the purpose of this CIA, the terms "State-owned land" and "State-leased land" shall be considered synonymous.) The 23,000 acres link the centrally located U.S. Government-owned Cantonment to the training areas north and south of the Cantonment. The retention of State-owned land, also referred to in the EIS and throughout the current document as the project area, is a real estate/administrative action that would enable continued military use of the State-owned land. The EIS to which this CIA is appended evaluates the potential impacts of alternatives that meet the Purpose and Need of the project. Alternatives analyzed in the EIS include 1) maximum retention of State-owned land, 2) modified retention, 3) minimum retention, and 4) a no action alternative, under which the Army would not retain State-owned land after the terms of the current lease expire in 2029.

The main objectives of this CIA are to analyze and assess the impact of the Proposed Action, its alternatives, and mitigation measures on cultural practices and features associated with the project area to promote responsible decision making. These objectives are guided largely by the Office of Environmental Quality Control "Guidelines for Assess Cultural Impacts" adopted November 19, 1997 (OEQC 2012:11-13). These objectives were achieved by collecting ethnographic information from archival and contemporary resources relevant to the project area to make a good faith effort to identify cultural beliefs, practices, and resources of Native Hawaiians and other ethnic groups associated with the project area.

PTA is located between the volcanoes of Mauna Loa, Mauna Kea and Hualālai, in an area referred to as the "Saddle Region" (**Figure 1**). PTA is the largest contiguous United States (U.S.) military live-fire range and maneuver training area in Hawai'i. The training area covers 132,000 acres, consisting of impact areas, firing ranges, an airfield, and maneuver areas. PTA has been used for more than 60 years and is the primary ground maneuver tactical training area that provides the U.S. Indo-Pacific Command with capabilities to support home-station training, joint training with other U.S. military units, and multinational training with other Indo-Pacific region militaries.

### 1.1 Proposed Action

The Army proposes to retain up to approximately 22,750 acres of State-owned land prior to the expiration of the current lease in 2029 to ensure training is not interrupted. The Army Proposed Action does not include retention of approximately 250 acres of the State-owned land that is administered by the Department of Hawaiian Home Lands (DHHL). The purpose of the proposed action is to enable the Army to continue to conduct ongoing activities on the State-owned land, including those activities needed to meet its ongoing training requirements.

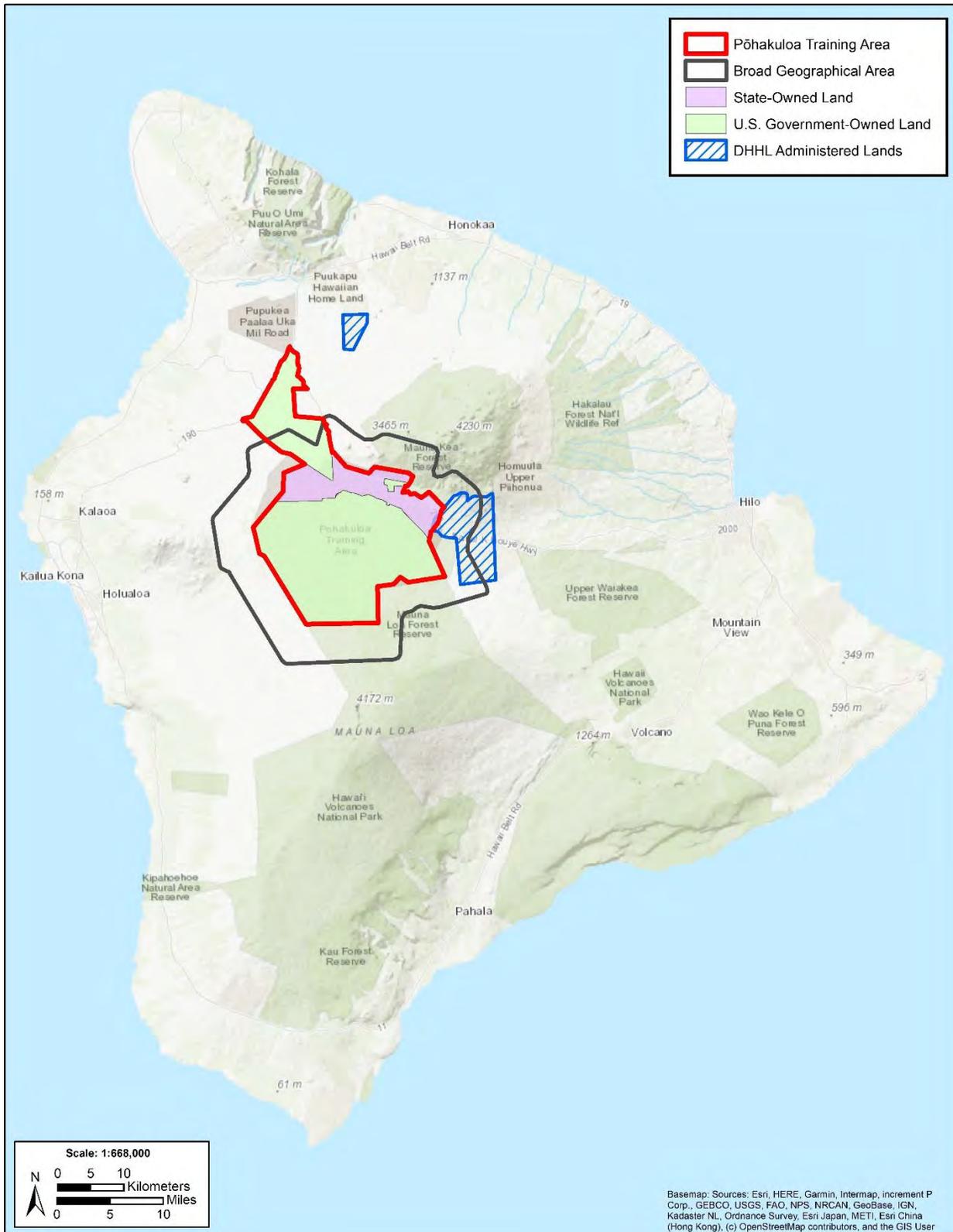


Figure 1. Location

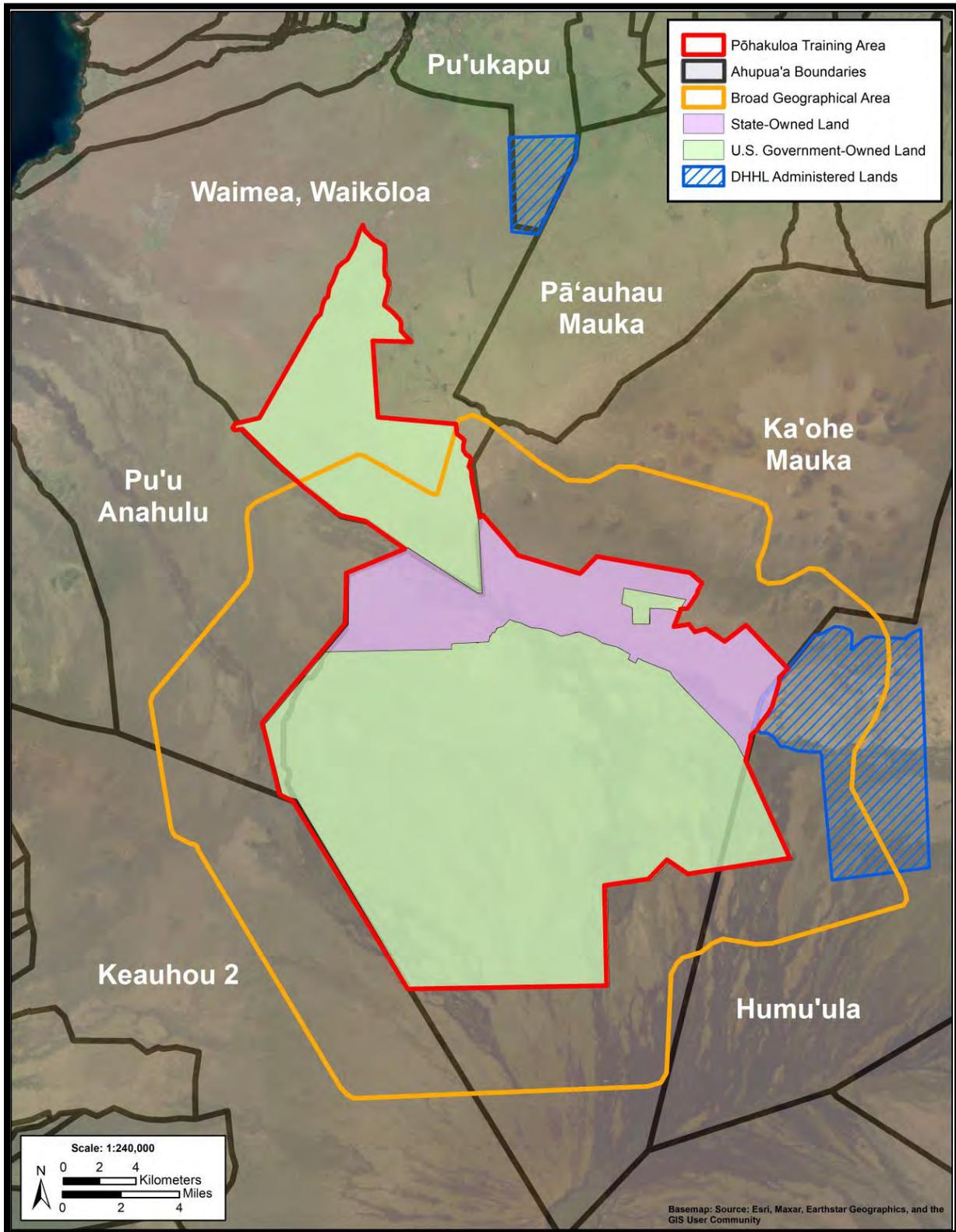


Figure 2. Project Area and Broad Geographical Area with Ahupua'a

The Proposed Action is a real estate action (i.e., administrative action) that would enable continuation of ongoing activities on the State-owned land retained by the Army. It does not include construction, modernization, or changes to ongoing activities on State-owned land retained. Additionally, the Proposed Action does not include changes to the use, size, or configuration of the special use airspace overlying the State-owned land. The type, volume, and conduct of training, maintenance and repair activities, and resource management actions that occur at PTA were described in the *Programmatic Agreement among the U.S. Army Garrison, Pōhakuloa Training Area, the U.S. Army Garrison, Hawaii, the Hawaii State Historic Preservation Officer, and the Advisory Council on Historic Preservation Regarding Routine Military Training Actions and Related Activities at the United States Army Installations on the Island of Hawai'i, Hawai'i*. Current activities within the State-owned land were previously analyzed in separate NEPA documents, as discussed in the EIS, and future construction, modernization, or changes in ongoing activities within the retained State-owned land would require separate NEPA (and potentially HEPA) compliance, as applicable. The EIS provides additional details of the Proposed Action.

Following arrangement for retention of the State-owned land, the Army would continue to conduct Army ongoing activities (military training; facility, utility, and infrastructure maintenance and repair activities; resource management actions; and associated activities such as emergency services) on the retained State-owned land. The Army also would continue to permit and coordinate ongoing activities (training and other activities such as public use programs) on the retained State-owned land by other PTA users, including Department of Defense (DoD) agencies, international partners, local agencies, and the community.

## 1.2 Regulatory Framework

The Proposed Action requires compliance with the National Environmental Policy Act of 1969 (NEPA). NEPA requires federal agencies to examine the direct and indirect environmental impacts that may result from the Proposed Action and alternatives, including potential impacts to “historic and cultural resources” (40 United States Code 1502.16(a)(8)). NEPA requirements ensure that environmental information is available to public officials and citizens for review before decisions are made and before actions are taken. The EIS will address relevant laws and regulations to provide decision makers with a comprehensive overview of the regulatory issues associated with the Army’s Proposed Action.

The EIS to which this CIA is appended was also prepared in accordance with HRS Chapter 343 and HAR Chapter 11-200.1. The Hawai'i statute and rules for the environmental impact assessment process (collectively referred to as HEPA) require project proponents to assess Proposed Actions for potential impacts on the environment including cultural practices and cultural resources. Act 50, Session Laws of Hawai'i (SLH) 2000, amended HRS 343-2 to include disclosure of the effects of a Proposed Action on the cultural practices of the community (used in the current document to mean people living in the towns, cities, and rural areas around the project area, who do not necessarily share the same ethnic group) and State, particularly the Native Hawaiian community.

This document supports NEPA and HEPA processes by compiling information on existing conditions of cultural resources, practices, and beliefs known to exist within the State-owned land.

### 1.2.1 Regulatory Background Under HRS 343

According to Act 50, SLH 2000 (which amended HRS 343), “Articles IX and XII of the State Constitution, other State laws, and the courts of the State impose on government agencies a duty to promote and

protect cultural beliefs, practices, and resources of native Hawaiians as well as other ethnic groups.” To assist decision makers in the protection of cultural resources, Chapter 343, HRS and HAR §11-200.1 rules for the environmental impact assessment process require project proponents to assess proposed actions for their potential impacts to cultural properties, practices, and beliefs.

Act 50 recognized the importance of protecting Native Hawaiian cultural resources and required that EISs include the disclosure of the effects of a proposed action on the cultural practices of the community and State, and the Native Hawaiian community in particular. This CIA includes information relating to practices and beliefs of a particular cultural or ethnic group or groups. The information was obtained through public scoping, community meetings, ethnographic interviews, and oral histories.

### 1.3 Project Area Description

The project area for the Proposed Action consists of approximately 23,000 acres of State-owned land currently leased by the U.S. Government. The project area encompasses five Tax Map Key (TMK) parcels: [3] 4-4-015:008, [3] 4-4-016:005, [3] 3-8-001:013 & 022, and [3] 7-1-004:007. The project area for the Proposed Action includes portions of two relatively large ahupua‘a in the Saddle Region of Hawai‘i Island, Ka‘ohe Mauka ahupua‘a and Humu‘ula ahupua‘a. Some historic maps show a small portion of Pu‘u Anahulu ahupua‘a also in the project area. The vast majority of PTA is within Ka‘ohe Mauka ahupua‘a (**Figure 2**).

The Integrated Cultural Resource Management Plan for the U.S. Army Garrison – Pōhakuloa (2018) describes the region in which PTA is located:

At the center of the island is the high-elevation Saddle Region or interior plateau, formed by the convergence of lavas from Mauna Kea, Mauna Loa, and Hualālai. Most of PTA is located on the Saddle, at elevations from about 5,000 to 8,800 feet amsl. The northwest portion of PTA, the Ke‘āmuku Maneuver Area, extends from 5,000 to 2,500 feet amsl on the northwest leeward slope of Mauna Kea. Large areas of the Saddle are pāhoehoe and ‘a‘ā lava flows from Mauna Loa. The flows contain subsurface features such as lava tubes and lava blisters; the lava tubes form extensive and sometimes interconnected networks of underground passageways that are accessed from the surface by collapsed openings. Other volcanic constructs in the Saddle Region include pu‘u (spatter or scoria cones). Older lava flow surfaces are preserved in pāhoehoe, which are islands of pre-existing terrain and vegetation surrounded by more recent lava flows. Mauna Kea eruptions are represented by sediment covered flows with some lava tubes and pu‘u, some of which are now surrounded by Mauna Loa flows (USAGHI-PTA, 2018).

#### 1.3.1 Training Areas, Facilities, Utilities, and Infrastructure

The State-owned land includes Training Areas (TAs) 1–15, 18, 19, and 20, and portions of TAs 16, 17, 21, and 22 (including the northern portion of TA 22B), which accounts for 22 of the 24 TAs at PTA. The TAs are used for maneuver and weapons training and include a variety of training and support facilities, utilities, and infrastructure. U.S. Government-owned facilities within the State-owned land include live-fire and non-live-fire firing points; ranges for mounted, dismounted, and aviation training; and support facilities such as ammunition storage areas and helicopter and tilt-rotor aircraft landing zones. U.S. Government-owned utilities within the State-owned land include electricity (electrical distribution lines and the installation’s only electrical substation), potable water facility (pump stations, storage tanks, chlorination system, and distribution pipe), fire protection water

(storage tank and distribution pipe), and communications equipment. U.S. Government-owned infrastructure within the State-owned land includes roads (65 miles), training trails (94 miles), and firebreaks/fuel breaks. The State-owned land supports larger than company-sized units (i.e., battalion and brigade) for live-fire and maneuver exercises. (See EIS for additional information.)

### 1.3.2 Project Area and the Broad Geographical Area

This CIA identifies and assesses potential impacts to cultural practices through a careful inventory of the natural and cultural environment with particular attention to archaeological sites, culturally significant landforms, places, and flora and fauna.

The assessment of cultural impacts from the Proposed Action is not limited to the State-owned land and considers “cultural resources, practices, and beliefs within the broad geographical area” (OEQC 2012:12). The OEQC guidelines recommend that an “ahupua’a is usually the appropriate geographical unit to begin an assessment of cultural impacts of a proposed action” (OEQC 2012:11). Since the current project area is not easily bounded by a single ahupua’a, and with the intent to maintain a consistently developed “broad geographical area”, this analysis considers a three mile buffer around the State-owned land and U.S. Government-owned land at PTA within the Saddle Region (**Figure 1** and **Figure 3**). The Saddle Region, historically also known as part of the ‘āina mauna<sup>2</sup>, is generally known as the area between Mauna Kea, Mauna Loa, and Hualālai, although the area is not officially defined. Langlas et al. (1999) note that the Saddle Region is “at an elevation of about 1,800 to 2,100 m (6,000 to 7,000 ft) in the two large ahupua’a Ka’ohe and Humu’ula.”

Creating a broad geographical area in the form of a three mile buffer around the Proposed Action’s project area (State-owned land) and Government-owned land in the Saddle Region affords an opportunity for the analysis to be consistently “greater than the area over which the proposed action will take place” (OEQC 2012:11).

The CIA does not, nor does it intend to, identify all cultural resources within this broad geographical area; rather the CIA assesses how the Proposed Action within the State-owned land would potentially affect cultural practices associated with the project area and broad geographical area. This study therefore considers two areas: the project area (State-owned land) and the broad geographical area. The level of inquiry and study is most intensive within the project area with additional considerations for the broad geographical area where appropriate.

The project area includes State-owned land. The project area is located primarily within the ahupua’a of Ka’ohe Mauka in the moku of Hāmākua with a small area of the western portion of the Humu’ula ahupua’a in the moku of Hilo.

The broad geographical area includes a three mile buffer around the State-owned land and U.S. Government owned lands in the Saddle Region. This area is located largely in the ahupua’a of Ka’ohe Mauka in the moku of Hāmākua, but also stretches into the western portion of Humu’ula ahupua’a in the moku of Hilo, the southern portion of Waikōloa (Waimea) ahupua’a in the moku of (South) Kohala, and the ahupua’a of Keauhou and Pu’u Anahulu in the moku of (North) Kona (**Figure 2**).

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<sup>2</sup> The Department of Hawaiian Home Lands, which administers land in the broad geographical area, refers to the upper reaches of all mountain lands as ‘āina mauna through the ‘Āina Mauna Legacy Program.

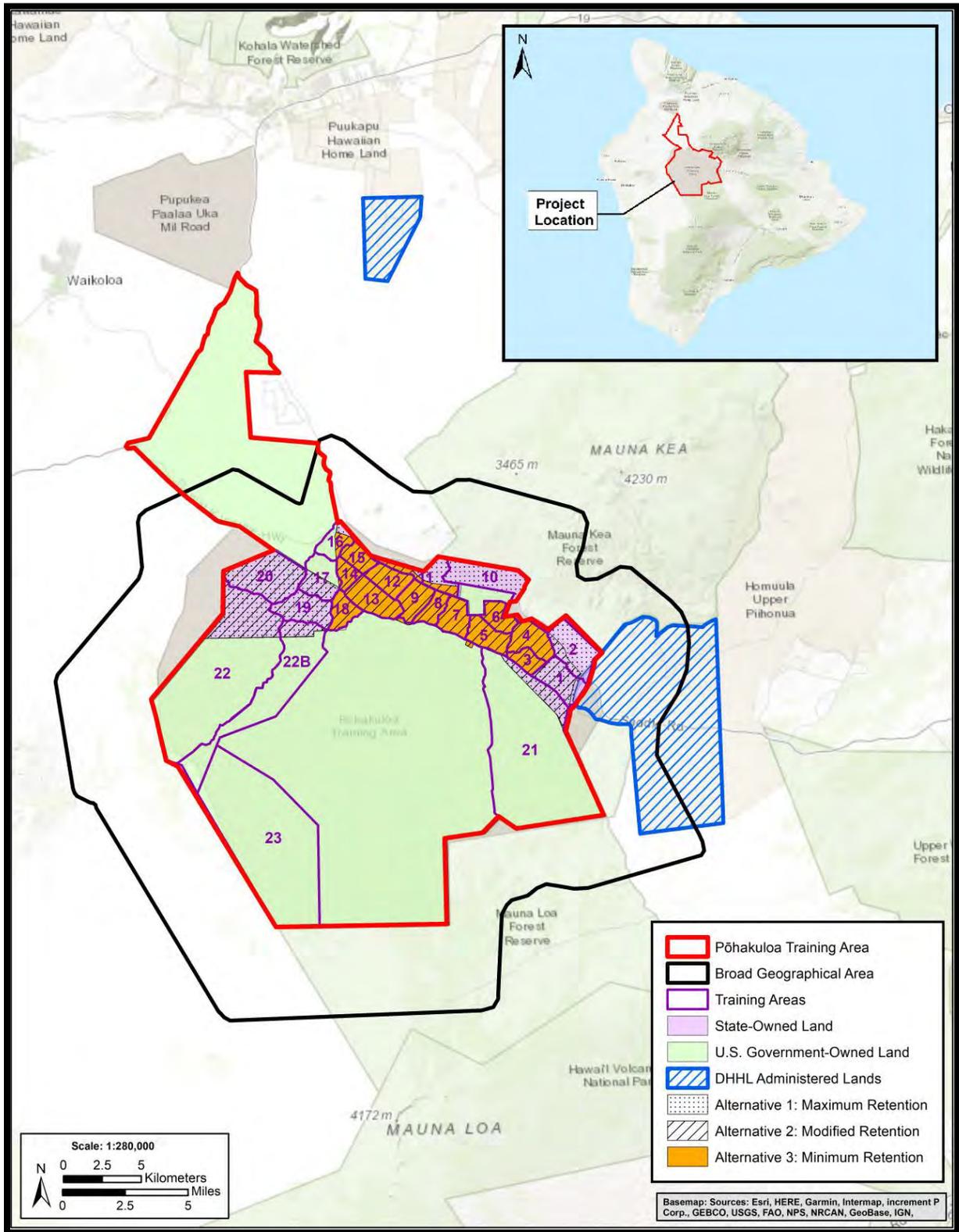


Figure 3. Project Area with Training Areas and Broad Geographical Area

## 1.4 Limitations of the Study

This study was initiated during the COVID-19 pandemic when in-person contact was limited. Online surveys were conducted to solicit knowledge from the public while limiting in-person contact. It was often difficult, however, to ascertain whether survey respondents had “expertise concerning the types of cultural resources, practices and beliefs found within the broad geographical area” or whether they had “knowledge of the area potentially affected by the proposed action” (OEQC 2012:12), since some of the feedback received was too generalized or did not relate to the direct project area or its broad geographical area.

The second phase of research attempted to resolve this challenge by directly contacting knowledgeable individuals to request their participation in one-on-one interviews (**Appendix C; Section 2.2**), which were subsequently compiled and utilized for the current study. The individuals interviewed were assumed to be familiar with the project area because of their self-identification. The willingness or comfort-level of Native Hawaiians and other ethnic groups to participate in the study and disclose their mana’o (knowledge) remains a limiting factor in the current study. Overall, interviewees were given every opportunity to share as much as they were comfortable with sharing.

All interviewees had access to maps of the project area from the EIS Public Notice (see Section 2.2.1). Maps were not provided during the interviews because providing project maps during an interview does not always help the interviewee differentiate between a specific project area and a more general area, since the Native Hawaiian concept of the cultural landscape may be different than that understood by a defined project area relative to a Proposed Action. Therefore, a limitation of the current study is that cultural resources, practices, and beliefs identified by interviewees may not have a conclusive association with the project area.

## 1.5 Confidential Information Withheld

Although interviewees were typically willing to share generalities on cultural resources, practices, and beliefs associated with the project area, at times, they may have withheld specific details on cultural practices if it was not appropriate to share in a public document. These details may include how and where certain cultural practices take place. As stated in the previous section, interviewees were given every opportunity to share as much as they were comfortable with sharing.

## 1.6 Conflicting Information

Item I of the OEQC content guidelines asks preparers of CIAs to include a “discussion concerning any conflicting information in regard to identified cultural resources, practices, and beliefs” (OEQC 2012:13). While interviewees sometimes shared conflicting information on the meaning of a place name or the specific details of mo’olelo, this level of conflict was not understood to be critical to the results of the study, particularly since many of the interviewees are representing a culture whose beliefs and practices are based on oral traditions, which often differ among family or other groups.

## 2.0 Methodology

The main objective of this CIA is to analyze and assess the impact of the Proposed Action, its alternatives, and mitigation measures on cultural practices and features associated with the project area to promote responsible decision making. These objectives are guided by the Hawai'i State Office of Environmental Quality Control (OEQC) "Guidelines for Assessing Cultural Impacts" adopted November 19, 1997 (OEQC 2012:11-13).

The OEQC guidelines recommend that preparers of CIAs implement the following protocols detailed in **Table 1**.

Table 1. Consistency with OEQC Guidelines for Assessing Cultural Impacts (OEQC 2012:12)	
OEQC Guidelines	CIA Discussion
Identify and consult with individuals and organizations with expertise concerning the types of cultural resources, practices, and beliefs found within the broad geographical area, e.g., district or ahupua'a.	Section 2.2
Identify and consult with individuals and organizations with knowledge of the area potentially affected by the proposed action.	Section 2.2
Receive information from or conduct ethnographic interviews and oral histories with persons having knowledge of the potentially affected area.	Section 2.2
Conduct ethnographic, historical, anthropological, sociological, and other culturally related documentary research.	Chapters 3, 4, 5, and 6
Identify and describe the cultural resources, practices, and beliefs located within the potentially affected area.	Sections 4.3, 5.3, and 6.3
Assess the impact of the proposed action, alternatives to the proposed action, and mitigation measures, on the cultural resources, practices, and beliefs identified (see Chapters 8 and 9).	Chapters 8 and 9

Ethnographic archival documentation and data obtained from ethnographic interviews were compiled to meet these objectives. Methods for archival research and ethnographic interviews are presented in **Sections 2.1** and **2.2**, respectively.

The OEQC guidelines also specify various content recommendations for CIAs, which are presented in **Table 2**.

<b>Table 2. Consistency with OEQC Recommendations for Content (OEQC 2012:13)</b>	
<b>OEQC Guidelines</b>	<b>CIA Discussion</b>
A discussion of the methods applied.	Chapter 2
Results of consultation with individuals and organizations identified by the preparer as being familiar with cultural practices and features associated with the project area.	Chapter 5 and Section 6.2
Constraints or limitations which might have affected the quality of the information obtained.	Section 1.4
A description of methods adopted by the preparer to identify, locate, and select the persons interviewed, including a discussion of the level of effort undertaken.	Section 2.2
Ethnographic and oral history interview procedures, including the circumstances under which the interviews were conducted, and any constraints or limitations which might have affected the quality of the information obtained.	Section 2.2.3 and 1.5
Biographical information concerning the individuals and organizations consulted, their particular expertise, and their historical and genealogical relationship to the project area, as well as information concerning the persons submitting information or interviewed, their particular knowledge and cultural expertise, if any, and their historical and genealogical relationship to the project area.	Section 2.2.2.1
A discussion concerning historical and cultural source materials consulted, the institutions and repositories searched and the level of effort undertaken.	Section 2.1
This discussion should include, if appropriate, the particular perspective of the authors, any opposing views, and any other relevant constraints, limitations or biases.	Sections 1.5, 1.7, 2.1.1, 2.1.2
A discussion concerning the cultural resources, practices and beliefs identified, and, for resources and practices, their location within the broad geographical area in which the proposed action is located, as well as their direct or indirect significance or connection to the project site.	Sections 2.3.1 and Chapter 6
A discussion concerning the nature of the cultural practices and beliefs, and the significance of the cultural resources within the project area affected directly or indirectly by the proposed project.	Section 6.3
An explanation of confidential information that has been withheld from public disclosure in the assessment.	Section 1.5
A discussion concerning any conflicting information in regard to identified cultural resources, practices and beliefs.	Section 1.7
An analysis of the potential effect of any proposed physical alteration on cultural resources, practices or beliefs; the potential of the proposed action to isolate cultural resources, practices or beliefs from their setting; and the potential of the proposed action to introduce elements which may alter the setting in which cultural practices take place.	Section 2.4 and Chapter 8
A bibliography of references and attached records of interviews which were allowed to be disclosed.	Chapter 11 and Appendix C

This CIA provides a review of cultural resources, practices, and beliefs that are known to have occurred within the project area or were likely to have occurred based on the resources present in the area and known practices associated with those resources. This review demonstrates a good faith effort based on the best data available to disclose the presence of cultural resources, practices, and beliefs associated with the project area.

The following sections describe the methods and procedures that were implemented to address the six OEQC protocol recommendations for CIAs, including archival research (**Section 2.1**); identification, consultation, and interviews of knowledgeable individuals and/or organizations (**Section 2.2**); methods to identify cultural resources, practices, and beliefs within each project area and broad geographical area (i.e., potentially affected area) (**Section 2.3**); analysis of potential impacts on those cultural resources, practices, and beliefs from the Proposed Action (**Section 8.0**); and mitigation measures to avoid, minimize, rectify, or reduce potential impacts from the Proposed Action (**Section 9.0**).

## 2.1 Archival Research Methods

Foundational research for the CIA began with an assessment of archival documents, oral traditions (oli [chants], mele [songs, poetry], pule [prayers], and/or hula [dance]), historical maps, and Hawaiian language sources including books, manuscripts, and newspaper articles. This research focused on identifying recorded cultural resources present on the landscape, including Hawaiian and non-Hawaiian place names; landscape features (ridges and gulches); archaeological features (kuleana [tenured land] parcel walls, house platforms, shrines, heiau [places of worship], etc.); culturally significant areas (viewsheds, unmodified areas where gathering practices and/or rituals were performed); and significant biological, physiological, or natural resources.

Primary references used in the research for this document included, but were not limited to: land use records, including the Hawaiian Land Commission Awards (LCA) records from the Māhele ʻĀina (Land Division) of 1848; the Boundary Commission Testimonies and survey records of the Kingdom and Territory of Hawaiʻi; and historical texts authored or compiled by W. Ellis (1963), J.P. ʻĪī (1983), S.M. Kamakau (1964, 1976, 1992), D. Malo (1951); and records of the American Board of Commissioners of Foreign Missions (A.B.C.F.M.) (1820–1860), I. Bird (1964), G. Bowser (1880), A. Fornander (1918–1919), C. Wilkes (1970), and many other native and foreign writers. The study also includes historical records authored by nineteenth-century visitors and residents of the surrounding geographical areas.

Historical and archival resources were located in the collections of the Hawaiʻi State Archives, Survey Division, Land Management Division, and Bureau of Conveyances; the Bishop Museum Library and Archives; the Hawaiian Historical Society and the Hawaiian Mission Children’s Society Library; University of Hawaiʻi-Hilo Moʻokini Library; the National Archives and Records Administration (NARA); the Library of Congress; the National Oceanic and Atmospheric Administration National Library; the Smithsonian Institution Natural History and National Anthropological Archives libraries; the Harvard Houghton Library; the United States Geological Survey (USGS) Library; the Paniolo Preservation Society and Parker Ranch collections; private family collections; the collection of Kumu Pono Associates LLC, and USAG-HI.

In addition to the broad range of primary references listed above, other source documents were researched to broaden the cultural background of the project area, as outlined below.

### **2.1.1 Historical Accounts**

A collection of narratives written by Native Hawaiian authors and nineteenth-century historians are presented throughout this CIA, recording history, the occurrence of events and travel, and traditions of place names. Several of the mo'olelo were translated here from the original Hawaiian by Kepā Maly.

Among the most significant sources of native mo'olelo are the Hawaiian language newspapers which were printed between 1838 and 1948, and the early writings of foreign visitors and residents. Most of the accounts that were submitted to the papers were penned by native residents of areas being described and noted native historians. Several traditions naming places in Humu'ula, Ka'ohē, and the larger 'āina mauna (mountain lands) have been located in these early writings. Those accounts describe native practices, the nature of land use at specific locations, and native lore, providing a means of understanding how people related to their environment and sustained themselves on the land (Maly and Maly 2005: 18).

As Puakea Nogelmeier (2010) discusses, there are benefits to a methodology that properly researches and considers Hawaiian language resources. Nogelmeier strongly cautions against a monorhetorical approach that marginalizes important native voices and evidence from consideration, specifically in the field of archaeology. For this reason, this CIA consciously employs a polyrhetorical approach, whereby historical accounts, regardless of language, are researched and considered (Nogelmeier, 2010).

Over the last 30 years, Kepā Maly has reviewed and compiled an extensive index of articles published in the Hawaiian language newspapers, with particular emphasis on those narratives pertaining to lands, customs, and traditions. Parts of the archival research used in this CIA were previously compiled and published by Kepā and Onaona Maly and others, who are cited.

### **2.1.2 Historical Maps**

Historical maps were used to locate places, names, features, and resources pertinent to the current study. Surveyors of the nineteenth and twentieth centuries documented features and resources on the landscape throughout Hawai'i.

Historical maps were georeferenced, to the extent possible, using ESRI ArcMap 10.8.1 software and overlaid with geographic information system (GIS) shapefiles of the project area. Note that historical maps prepared using older cartographic methods do not always accurately depict the physical landscape, which can limit georeferencing. Historical maps were carefully studied, and the features detailed therein were aggregated and categorized to help identify relevant cultural features. From these, new maps were created that more thoroughly capture the range of resources in the project area.

### **2.1.3 Previous Ethnographic Studies and Interviews**

Previous ethnographic studies and interviews provide valuable ethnographic information that is no longer attainable (e.g., from previous generations or elders). This CIA researched publicly available ethnographic studies of the project area.

#### 2.1.4 Archaeological and Biological Studies

The current study uses information from archaeological studies to help identify cultural practices that occurred in the project area.

Information regarding recorded archaeological sites helps inform the development of a CIA by indicating practices that may have occurred at tangible (i.e. physical) cultural resources. For example, the practice of uhaul humu pōhaku (dry-stone stacking) and making petroglyphs and petrographs within a project area may be indicated by previously recorded archaeological sites in the project area with dry-stone stacked walls and/or evidence of petroglyphs. Cultural beliefs may also be indicated by the presence of heiau or shrines within a project area.

Similarly, this CIA also uses information from biological studies to identify whether biological resources present within the project area which may be associated with cultural resources, practices, and beliefs, such as the practice of lā'au lapa'au, which is the Traditional Hawaiian<sup>3</sup> practice of wellness, health, and healing. Flora and fauna in the broad geographical area are not identified or considered unless identified in the ethnographic research. Flora or fauna that are not identified in biological studies as candidate, threatened, or endangered may not be identified or considered unless specifically identified by informants as being present in the project area and utilized as part of a cultural practice.

### 2.2 Interview Selection and Methods

Per the OEQC guidelines (2012:12–13), this section outlines a discussion of the methods applied to identifying individuals and/or organizations “with expertise concerning the types of cultural resources, practices and beliefs found within the broad geographical area”, “with knowledge of the area potentially affected by the proposed action” and/or who are “familiar with cultural practices and features associated with the project area.”

#### 2.2.1 Public Outreach to Identify Potential Informants

Three public outreach methods were used to identify potential individuals who have expertise and knowledge of cultural resources, practices, and beliefs relevant to the project area and broad geographical area, and who might be willing to participate in a one-on-one interview. These three methods are described below.

##### 2.2.1.1 *Ka Wai Ola*

To provide notice to the general public as to the opportunity to participate in the CIA, Honua Consulting, LLC placed public notices in the Office of Hawaiian Affairs *Ka Wai Ola* for the months of October 2020 and November 2020. It was republished in December 2022. **Figure 4** below provides

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<sup>3</sup> “Traditional Hawaiian” in this document refers to Hawaiian customs, practices, and beliefs that have been shared through multiple generations of Hawaiians.

a copy of this notice. A description of the online survey is in **Section 2.2.1.2**, and summaries of the online responses for the project area are in **Section 5.1.1**.

**ENVIRONMENTAL IMPACT STATEMENT -  
PŌHAKULOLOA TRAINING AREA**

The Department of the Army is in the beginning stages of the preparation of an Environmental Impact Statement (EIS) that analyzes the environmental and cultural effects of the proposed retention of up to approximately 23,000 acres of State-owned land at Pōhakuloa Training Area. The EIS is being prepared in accordance with National Environmental Policy Act (NEPA), Hawai'i Revised Statutes Chapter 343, and Hawai'i Administrative Rules Chapter 11-200.1. The project area is comprised of Tax Map Keys 4-4-015:008; 4-4-016:005; 3-8-001:013 & 022; and 7-1-004:007 in the ahupua'a of Ka'ohē Mauka on the Island of Hawai'i. At a minimum, the EIS shall consider three (3) action alternatives and a no action alternative. A Cultural Impact Assessment (CIA) will be prepared as part of the EIS. The CIA team is seeking consultation with practitioners, Native Hawaiian Organizations, stakeholders, and other individuals. Specifically, consultation is sought on a) identification of an appropriate geographic extent of study, b) historic or existing cultural resources that may be impacted by the proposed project, c) historic or existing traditional practices and/or beliefs that may be impacted by the proposed project, and d) identification of individuals or organizations that should be sought out for consultation on the CIA. Individuals or organizations may complete the CIA survey online at <https://www.surveymonkey.com/r/PohakuloaCIA> or contact the CIA team at [community@honuaconsulting.com](mailto:community@honuaconsulting.com) or (808) 392-1617. Questions or inquiries unrelated to the CIA will be directed to the EIS project team for review and response. ■

**Figure 4. Ho'olaha Lehulehu (Public Notice)**

### 2.2.1.2 Social Media

In addition to the ad in *Ka Wai Ola*, Honua Consulting, LCC placed a notice on their Facebook and Instagram accounts that announced the availability of the preparation of the CIA and linked the online survey. The notice specifically targeted the entirety of Hawai'i Island to identify potential persons who may be interested in participating and sharing information relevant to this study. Additionally, this eliminated any arbitrary selection of participants in this assessment. By making participation available to any interested party, the current study sought to maximize opportunity for participation to the widest group of individuals possible.

The online survey contained twenty-one questions to solicit preliminary information on the respondent's biographical details; potential association with the project area; knowledge of cultural resources, practices, and beliefs associated with the project area; awareness of any potential impacts to cultural resources, practices, and beliefs that may result from the Proposed Action; recommendations for potential mitigation measures; and an invitation to share additional information or documents. **Appendix B** contains a full copy of survey questions and responses received.

Two hundred thirty-six individuals provided responses to the online survey. The information given by these respondents provided preliminary information and informed the full analysis for the current study. Survey respondents were provided the contact information of Honua Consulting, LLC, but none of the respondents contacted Honua Consulting, LLC for a one-on-one interview. Summaries of the online responses for the project area are in **Sections 5.1.1** and **6.2**.

### 2.2.1.3 Outreach to Specific Organizations and Individuals

In addition to the public notices, Honua Consulting, LLC conducted outreach to specific organizations and individuals known to have knowledge and/or an association with the project area. These organizations and individuals were assembled from the list of Native Hawaiian Organizations (NHOs) and other parties provided by USAG-HI who identified their interest in being contacted about the project area. See **Appendix A** for the complete contact list for organizations and individuals contacted.

The interview team contacted each individual, some representing NHOs, from the list mentioned above via email. If an individual was not reached, it was determined the individual was not available for an interview. When individuals declined to be interviewed, this was documented in writing wherever possible (e.g., an email response). A communication log was maintained by Honua Consulting, LLC during this process.

## 2.2.2 Interview Selection Criteria

The goal of the outreach process discussed above was to obtain interviews based on the willingness of potential interviewees to participate in an ethnographic interview. Individuals were selected for a one-on-one interview based on the following OEQC (2012:12–13) recommendations:

- Have expertise concerning the types of cultural resources, practices, and beliefs found within the project area and/or the broad geographical area;
- Have knowledge of the area potentially affected by the Proposed Action;

- Have a historical or genealogical relationship to the project area;
- Were referred by other cultural practitioners (used in the current study to indicate an individual who regularly engages in, interprets, and guides others in cultural practices and beliefs), cultural resource professionals, or other interviewees;
- Are a documented NHO; and/or
- Have taken part in previous National Historic Preservation Act Section 106 consultation for the project area.

### **2.2.2.1 Biographical Information for Interviewees**

#### **Kamana Kapele**

Mr. Kapele is self-employed and retired. He currently lives in Kealakekua on Hawai'i Island. He was born on O'ahu and raised in Kāne'ohe until the mid-1960s, when his family then moved to Hawai'i Island. Mr. Kapele represents his family, the Kapele 'ohana.

Mr. Kapele's association with the project area is through his own namesake. Pu'u Kapele, a prominent geographic feature in the project area, is associated with his family name. He is also associated with the ki'i and shrine next to the pu'u.

#### **Dr. Kū Kahakalau**

Dr. Kahakalau is an educator, researcher, activist, and cultural practitioner. Dr. Kahakalau lives in Kukui Haile above Waipi'o Valley. She was born and raised in Honolulu. Dr. Kahakalau represents Kū-A-Kanaka, a Native Hawaiian social enterprise which is registered as an interested party with PTA.

As a researcher, educator, and cultural practitioner, Dr. Kahakalau brings a wealth of knowledge regarding Native Hawaiian practices and customs that take place in the area. Dr. Kahakalau stated that the entirety of the land at Pōhakuloa was culturally significant, and that any adverse impacts to the land by the Army represent adverse impacts on the integrity and psyche of Native Hawaiians, beyond the adverse impacts to the land itself.

#### **Carl Sims**

Mr. Sims is a part-time taro farmer and landscaper. He currently lives in Waipi'o Valley. Mr. Sims was born and raised in Hāmakua, specifically in Waipi'o Valley. As such, he is an active member within the community. Mr. Sims is associated with the project area through Native Hawaiian practices. He specifically mentioned Pu'uhuluhulu and making offerings to the associated kuahu.

Mr. Sims brings an awareness and understanding of how impacts on Mauna Kea and the general area of Pōhakuloa can also impact downstream environments and communities. He believes that the current trainings and Pōhakuloa can eventually adversely impact downstream areas such as Waipi'o in addition to negatively impacting the immediate area.

#### **Dr. Michelle Noe Noe Wong-Wilson**

Dr. Wong-Wilson is retired from the University of Hawai'i system. She is executive director of the Lālākea Foundation, a 501(c)(3). She has lived on the island of Hawai'i since 1989, and was born and raised in Kailua, O'ahu.

Dr. Wong-Wilson represents herself, her 'ohana, and the Hawaiian Civic Club of Hilo through her role as president. Dr. Wong-Wilson is associated with the project area, stating that she is a part of the "land basin" of the area. She noted that the land basin between Mauna Kea and Mauna Loa is highly significant. Dr. Wong-Wilson also explained that the military activities in the area are a major concern and pose a negative impact to herself, her 'ohana, and the organizations she is a part of and represents.

### 2.2.3 Interview Procedure and Documentation

Conducting one-on-one interviews and documenting information provided by knowledgeable individuals was an important data source for the current study. Interviews were conducted by Honua Consulting, LLC using the following protocols:

- Establishing a connection with the interviewee;
- Asking for permission to record the interview and receiving written consent to use the interviewee's data in the current study;
- Establishing the purpose of the interview to support development of a CIA for the Proposed Action and solicit information on the interviewee's knowledge of cultural resources, practices, and beliefs associated with the project area and potential impacts on those cultural elements from the Proposed Action;
- Asking twenty-one questions to solicit information on the interviewee's biographical details; association with the project area; knowledge of cultural resources, practices, and beliefs associated with the project area; awareness of any potential impacts to cultural resources, practices, and beliefs that may result from the Proposed Action; recommendations for potential mitigation measures; and an invitation to share additional information or documents. **Appendix C** contains a full list of the interview questions; these are the same questions asked during the public survey.

Based on the preference of the interviewee, three interviews were conducted over the telephone; one interview was conducted in person.

Once completed, interviews were reviewed and documented by:

- Honua Consulting, LLC compiling a summary of the discussion based on interview notes and recordings to highlight key themes relevant to the current study (interviews were not fully transcribed);
- Sending the draft summary to the interviewee to review/edit and provide written consent to use the summary in the CIA; and
- Producing a finalized summary, incorporating any interviewee edits, to be included in the CIA as an appendix (see **Appendix C**) and to be used for the impact analysis and mitigation recommendations.

All material, including recordings of interviews, remain the property of the interviewee, which is consistent with professional standards for the development of CIAs and the treatment of indigenous informants globally. Information on consent of interviewees to participate in this project is available from Honua Consulting, LLC upon request.

## **2.3 Methods for Identification of Cultural Resources, Practices, and Beliefs**

One of the core objectives of this CIA is to identify cultural resources, practices, and beliefs located within the project area and broad geographical area. Cultural resources as indicators of the relationship of people to their environment include not only culturally significant archaeological sites, but many other tangible and intangible elements of culture. In the Native Hawaiian belief system, for example, a landscape feature tied to mo'olelo, the name of a regionally specific wind, or the land itself can serve as a significant cultural resource. Cultural practices are the activities, methods, or customs associated with a community's belief system, such as the practice of gathering plants for traditional medicine or caring for ancestral remains. Beliefs reflect a community's world view and are at the core of a shared culture, such as the Native Hawaiian belief in the genealogical connection between people and kalo (taro, *Colocasia esculenta*).

The identification of these cultural elements was accomplished by synthesizing all data collected through archival research and ethnographic consultation compiled during the current study. Archival research facilitated identification of cultural resources, practices, and beliefs that once occurred or were associated with the project area prior to the U.S. military leases of the State-owned land. Ethnographic research helped corroborate archival data while also providing first-hand identification of cultural resources, practices, and beliefs from affected ethnic groups and individuals with knowledge of and/or historical/genealogical relationship to the project area. While the authors recognize the ethnic diversity of the State of Hawai'i, Native Hawaiians are the predominant ethnic group that expressed concern about the project area and Army activities on State-owned land. No other ethnic groups provided responses to this study.

### **2.3.1 Determining Direct or Indirect Significance**

In addition to identifying cultural resources, practices, and beliefs within each project area and broad geographical area, this CIA also needed to pinpoint the location where identified practices occur and where resources may be situated within the project area. The location of identified practices and resources was used to help facilitate a determination of their "direct or indirect significance or connection to the project site" (OEQC 2012:13).

Tangible cultural resources and their associated practices and/or beliefs can often be directly tied to the project area, whereas intangible practices and beliefs can be more difficult to place within a specific geographically bounded area. This concept was expressed by several individuals contacted for the current study. The practice and belief system of mālama 'āina (caring for the land), for example, is not easily bounded by a cartographic boundary or land ownership but may be landscape wide. The determination of direct or indirect connection of practices and beliefs to the specific project area is thus complicated by the fluid nature of some practices and beliefs and was not always confirmed by informants. Informants' comments were taken at face value, and there was no need to confirm connection beyond their response.

## 2.4 Impact Analysis Methods

Once cultural resources, practices, and beliefs within the project area and broad geographical area were identified, the potential impacts from the Proposed Action and its alternatives on those cultural resources and practices were identified and analyzed.

Impacts were identified from concerns shared during the survey and interview process. Two questions were formulated to solicit this information from the interviewee:

- Are you aware of any resources that may be impacted by such a project? What might those impacts be? (Question 13)
- Are you aware of any traditions or customs that may be impacted by such a project? What might those impacts be? (Question 15)

Interviewees' responses to these questions were then assessed for two key factors:

- The stated impact's direct and/or indirect association with the project area (e.g., is this impact associated with the physical extent of the State-owned land, the broad geographical area, an area beyond the broad geographical area, or some undisclosed/undefined area?).
- The stated impact's applicability to cultural practices, beliefs, and/or resources attested to be in and/or recorded within the project area and/or its broad geographical area.

Identified impacts with a direct and/or indirect association with cultural practices, beliefs, and resources recorded within the project area and/or its broad geographical area were then evaluated within the OEQC framework to analyze (OEQC 2012:13):

- “the potential effect of any proposed physical alteration on cultural resources, practices, or beliefs”;
- “the potential of the proposed action to isolate cultural resources, practices, or beliefs from their setting”; and
- “the potential of the proposed action to introduce elements which may alter the setting in which cultural practices take place.”

To help determine the extent of certain repeated impact concerns, some impacts were quantified by counting the number of interviewees who shared the same impact concern (e.g., repeat concerns about impacts to access).

The analysis also considers the effects of the long-term continuation of current activities for land to be potentially retained by the military, as is described for each project area. For land not retained, the impacts of reduced training were considered, as well as impacts from actions the military may take to restore the land (e.g., potential removal and/or detonation of unexploded ordnance [UXO], soil remediation activities, etc.).

For specific methods related to the evaluation of access, see **Section 7.4**.

## 2.5 Mitigation Recommendation Methods

Per the OEQC guidelines (OEQC 2012:12), this CIA also assesses mitigation measures for identified cultural resources, practices, and beliefs. The CIA authors identified and reviewed current management efforts to assess the ability of the existing Section 106 mitigation “to avoid, minimize, rectify, or reduce the project’s adverse impacts” on cultural practices, resources, and beliefs (OEQC 2012:22). The CIA authors also considered the ability of current efforts to mitigate impacts assessed by the three criteria outlined in **Section 2.4**. If the CIA authors determined current management efforts did not mitigate impacts to cultural practices, resources, and beliefs, the CIA authors developed new mitigation measures based on information received from interviewees.

## 3.0 Cultural Context

This section provides a contextual framework for understanding a broad range of interconnected cultural resources, practices, and beliefs that generally occurred throughout the project area and the broad geographical area. This information provides the necessary background for identifying and analyzing significant cultural resources, practices, and beliefs that may be impacted by the Proposed Action. The practices and beliefs covered in this section are intended to inform analyses within this CIA, but the research is not restricted to these items and the research methodology is designed to facilitate identification of existing practices and beliefs, if any are present.

### 3.1 Mālama ‘Āina

To Native Hawaiians, the land itself is a significant cultural resource and has genealogical connections to the Hawaiian people. Native Hawaiians also assign great cultural significance in the land in which they are born and originate. This overarching connection to the land is central to the Native Hawaiian belief system and, as such, results in associated cultural practices and beliefs. Paramount among them is the practice of mālama ‘āina or caring for the land. This can mean preserving, protecting, maintaining, or even tending (as in agriculture) the land. For example, traditional agricultural and subsistence practices consider the health and well-being of the entirety of the land, since the land itself also needed to be cared for in addition to the community’s needs.

### 3.2 ‘Ike Ku‘una (Traditional Knowledge)

The Traditional Hawaiian practice of sharing knowledge permeates many Native Hawaiian cultural practices and beliefs. Mele, oli, pule, and hula are some of the performative ways Hawaiians have passed on oral traditions and knowledge by using lyrical, musical, and artistic expression. Such practices serve as historical repositories of Hawai‘i’s traditional social and political history and contain explanations of native knowledge and management systems.

### 3.3 Ceremonial Practices and Performances

Cultural practices such as mele, oli, pule, and hula are also performed as ceremonial practice. These types of ceremonial practices and performances may be carried out at distinct cultural sites, such as heiau, which are significant physical structures constructed by Native Hawaiians as sites of worship and spiritual practice. Such practices may also be carried out in association with the celebration of Makahiki. Makahiki is another significant ceremonial cultural practice that centers on “rituals, prayers, offerings, and processions” performed over a four-month period to ask “Lono, the god of agriculture, to bestow plenty in the coming year” (Hommon 2013:99).

Native Hawaiians also engage in numerous ceremonial practices and performances centered around sharing genealogies and origin stories through mele, oli, and hula. Understanding the genealogies in Native Hawaiian creation stories are important for understanding Native Hawaiian traditional beliefs, because they speak to the kinship that exists between Native Hawaiians and the land.

The Kumulipo, for example, is a Native Hawaiian genealogical prayer chant that is divided into two parts, the first focusing on the pō (spirit world) and second on the ao (the world of living men) (Beckwith 1970:310–311):

The first part tells of the birth of the lower forms of life up through pairs of sea and land to the mammals known to the Native Hawaiians before the discovery by the Europeans: the pig, the bat, the rat, and the dog. The second period opens up with the breaking of light, the appearance of the woman La'ila'i and the coming of Kane the god, Ki'i the man, Kanaloa the octopus, together with two others, Moanalaha-i-ka-waokele (Vast expanse of wet forest), whose name occurs in romance as a chief dwelling in the heavens, and Ku-polo-liili-ali'i-mua-o-lo'i-po (Dwelling in cold uplands of the first chiefs of the dim past), described as a long-lived man of very high rank. There follow over a thousand lines of genealogical pairs, husband and wife...

Another Native Hawaiian genealogical account that is often chanted (performed) tells of Wākea (the expanse of the sky, the male) and Papahānaumoku (Papa, who gave birth to the islands, the female), also called Haumea-nui-hānau-wāwā (Great Haumea, born time and time again). Hawai'i, the largest of the islands, was the first-born of these island children. The birth of the islands is commemorated in various mele ko'ihonua (genealogical chants describing the formation of the earth).

These same god-beings, or creative forces of nature who gave birth to the islands, were also the parents of the first man (Hāloa); from this ancestor all kalo and Native Hawaiians are descended (Malo 1951; Beckwith 1970; Pukui and Korn 1973). It is this cultural attachment to the natural world and heavens above that defines and shapes the beliefs and cultural practices of Native Hawaiians (Maly and Maly 2005:4–10).

Native Hawaiians also engage in ceremonial practice and ritual for the care of the dead, burial remains, and funerary objects. Green and Beckwith (1926:180–181) described Native Hawaiian burial practices, including a purification ceremony, cave burial, and associated chant:

The burial was in old days always held at night and was attended by men alone. Relatives (two, four, or six in number according to the weight of the corpse) acted as bearers. Those who lifted the body would “kahoā” or “intercede” with it in some such words as “Ke hele ala oe, e hoomaha oe!” that is, “You are departing, rest yourself, do not make yourself a burden!” Should they find the body very heavy to lift, they would inquire of the dead who was holding him back, by naming each relative in turn until at some name the body grew lighter.

The rite of pi kai or “sprinkling with salt water” must be performed upon all the bearers and those who are going to the grave. This purification ceremony is also performed all about the house and yard in order “to drive out bad spirits from the house after a death and keep the good.” A calabash of water containing salt and a bit of olena root or of mauuakiaki grass is used for this purpose. This sprinkling of the house insures [sic] the return of the spirit in a clean state; without such a purifying rite it might return in anger and cause trouble in the house. Anyone attending a burial should also be sprinkled with salt water lest the spirit of the dead follow him home and do him mischief. Another means of keeping away wrathful spirits is to plant before the door a species of caladium called ape. Some persons in order to drive away evil spirits and keep them out, place under their bed-mats the leaves of the ti plant, of the ape, and of a certain banana called “lau-pala o ka maia lele,” that is, “yellow-leaf of the lele (flying) banana.”

The customary place of interment in old days was a cave in which the body was deposited. Often the mats were there opened, a pillow made of braided pandanus leaves stuffed hard with shredded leaves was placed under the head, and food left to supply the wants of the dead, should the dead revive. In the cave, the last ceremony was performed by a near relative, who circled the body with twigs of burning sandalwood to purify the air of the cavern. Before leaving the cave, the ohana, including the immediate family, relatives, and connections by marriage, chanted the following song:

<i>Aloha na hale o maua i makamaka ole!</i>	Grief for our home without our friend!
<i>Ka alanui hele mauka o Huliwale.</i>	The road that leads to the mountain Gainless-Search.
<i>E huli ae ana au i makana ia oe, a-a-a</i>	I am seeking a gift for you, alas!
<i>Aloha wale, e-, kaula, a-a-a!</i>	Boundless love, O (name of the dead), between us, alas!

### 3.4 Mo'olelo

Mo'olelo is the practice of storytelling and developing oral histories for the purpose of transmitting knowledge and values intergenerationally. Mo'olelo are expressions of native beliefs, customs, practices, and history. Mo'olelo are particularly critical in protecting and preserving traditional culture in that they are the primary form through which information was transmitted over many generations in the Hawaiian Islands and particularly in the Native Hawaiian community.

Storytelling, oral histories, and oration are widely practiced throughout Polynesia and are important in compiling the ethnohistory of the area. Hawaiian newspapers were particularly valued for their regular publication of different mo'olelo about Native Hawaiian history. Far less information about the cultural history of the Native Hawaiian people would be available today were it not for the printing and publication of mo'olelo in these newspapers.

Mo'olelo are largely dependent upon place. The land often served as muse for Traditional Hawaiians because places regularly inspired the mo'olelo that created the foundation for oral histories, which in turn were critical to Native Hawaiian epistemologies (systems of knowledge) and pedagogies (teaching methodologies).

Several of the mo'olelo used in this CIA were translated from the original Hawaiian by Kepā Maly; other mo'olelo were translated as part of this research by Native Hawaiian language experts. These mo'olelo date back to the first-hand accounts of those who traveled through the project area. Pertinent excerpts from the articles and papers are provided in this CIA. Some of these excerpts are provided verbatim, but in an effort to be judicious, summaries are provided for particularly voluminous accounts.

### 3.5 ‘Inoa ‘Āina (Place Names)

Traditionally, the practice of naming localities served a variety of functions, including to explain:

1) places where the gods walked the earth and changed the lives of people for good or worse; 2) heiau or other features of ceremonial importance; 3) triangulation points such as ko‘a (ceremonial markers) for fishing grounds and fishing sites; 4) residences and burial sites; 5) areas of planting; 6) water sources; 7) trails and trail side resting places (o‘io‘ina), such as a rock shelter or tree-shaded spot; 8) the sources of particular natural resources/resource collection areas, or any number of other features; or 9) notable events which occurred at a given area. Through place names knowledge of the past and places of significance was handed down across countless generations (Maly and Maly 2013:4).

An extensive collection of native place names is recorded in the mo‘olelo published in Hawaiian newspapers. The narratives in this CIA provide access to a rich collection of place names from the State-owned land and broad geographical area.

### 3.6 Kilo (Environmental and Weather-Related Observational Practices)

Kilo is the Hawaiian practice of making environmental and weather-related observations as well as the name for people who examine, observe, or forecast weather. Kilo “references a Hawaiian observation approach which includes watching or observing [the] environment and resources by listening to the subtleties of place to help guide decisions for management and pono [correct or proper procedure] practices” (‘Āuamo Portal 2021). Practices associated with kilo include the naming of regionally specific rains, wind, and pu‘u (hill, peak) that can be culturally significant to a particular area.

### 3.7 Ka‘apuni (Travel and Trail Usage)

Travel was an essential practice in Traditional Hawai‘i and was known by different names, including ka‘apuni, huaka‘i, or ka‘ahele. Traveling by sea had distinct names as well, such as ‘aumoana. Traveling through the mountains was sometimes referred to as hele mauna.

Native Hawaiians traversed the landscape using a complex network of foot-trails called ala or ala hele. These foot trails were used by nearly all members of Native Hawaiian society. Physical traces are still evident on the landscape in the form of worn bedrock, stone alignments, coral markings, or water-worn boulders laid across rough terrain (Hommon 2013:107; Apple 1965). Major coastal trails connected neighboring ahupua‘a, while inland trails traversed the various ecological zones of individual ahupua‘a, such as from coastal fishing grounds to cultivated lands in the island interior. Mountain trails permitted access overland to other areas of the island.

### 3.8 Agricultural and Subsistence Practices

Native Hawaiians continue to engage in a range of subsistence practices, including cultivating kalo and ‘uala (sweet potato, *Ipomoea batatas*), and procuring marine and land-based resources for food and other sustenance needs. Kalo was traditionally grown wherever there was adequate rainfall; however, river valleys where lo‘i could be built provided ideal conditions for growing and were among the most agriculturally productive. Kalo is still grown for subsistence today.

Drier areas, which could not support kalo cultivation, were traditionally planted with ‘uala. Other cultigens were also grown traditionally including pia (arrowroot, *Tacca leontopetaloides*), kō (sugarcane, *Saccharum officinarum*), kī (ti, *Cordyline terminalis*), mai‘a (banana, *Musa x paradisiacal*), and niu (coconut, *Cocos nucifera*). Like kalo, these cultigens continue to be cultivated by Native Hawaiians today.

Although domestic pigs and fowl were traditionally available, the sea offered an abundant source of animal food (Kirch 1985:2–3). The coastal exploitation of marine resources in Hawai‘i has always focused on fishing, aquaculture, and the collection of various species of limu (seaweed) and marine invertebrates.

Many subsistence practices contributed to the economy and determined land use (Kirch 1985:2–3). The balance between saltwater food sources and freshwater food sources was delicate and crucial for subsistence practices. The boundaries of ahupua‘a were determined based on agriculture and food practices and resource availability. Each ahupua‘a ideally carried the necessities for agricultural and subsistence practices. Ahupua‘a were self-sufficient and each had their own production pattern based on their resources (Kirch 1985:2). In times of drought, flood, or other natural disruptions, Traditional Hawaiians relied on neighboring land sections for support.

Agriculture continued to develop into the modern era with the introduction of foreign metal tools and new ethnic groups who tended introduced crops, such as rice. Native Hawaiians and other ethnic groups worked on plantations while continuing to engage in subsistence agricultural on a community or family scale through the early to late Historic Period.

The ocean is an essential part of Native Hawaiian culture. Hawaiian language resources, like those presented in *Ka ‘Oihana Lawai‘a* (Kahā‘ulelio 2006), demonstrate the extensive techniques, methods, tools, practices, and beliefs associated with fishing and aquaculture. Kahā‘ulelio (2006) described in detail over forty different fishing methods.

Pig hunting was practiced historically by Native Hawaiians and other ethnic groups and continues to be an important cultural practice for Native Hawaiians and other ethnic groups. A 2015 court case declared pig hunting a protected right for a Native Hawaiian on land associated with his kuleana land that was not specifically signed or fenced to indicate private property; expert and kama‘āina testimonies stated the practice played an important role in ancient Hawaiian subsistence living and was still being passed down and practiced today (State v. Palama, 136 Haw. 543, 364 P.3d 251 (Ct. App. 2015)).

In 2018, the Hawai‘i Division of Forestry and Wildlife (DOFAW) posted an online survey to collect information from hunters in Hawai‘i about public hunting land use during 2017, and 1,198 hunters responded to the survey. Hunters’ responses supported the role of hunting in cultural and subsistence practices. The survey included questions about “each hunter’s license, hunting history, spending, hunting locations, game harvest, organization membership status, and comments about various topics related to hunting” (DOFAW 2018:3). When asked for the “three most important reasons” for hunting, 1,198 hunters responded that they hunted (in order from most to least popular answer) to acquire wild game meat (63%), to spend time in nature (61%), to spend quality time with family and friends (54%), for recreation and sport (54%), for subsistence hunting (39%), because hunting is a tradition in their family (36%), and for trophy hunting (6%) (DOFAW 2018:6). In addition, 93 percent of hunters wrote in a reason to this question, including, but not limited to, “spiritual connection and cultural or religious reasons” (DOFAW 2018:6). Forty-six percent of the

1,198 hunters responded that less than nine meals per month were supplemented with the game that was hunted, 36 percent supplemented nine to 30 meals per month, and seven percent supplemented more than 30 meals per month (DOWFAW 2018:8). When asked how many game animals were harvested on public hunting areas, 577 hunters responded in total and reported harvesting 1,885 mammals on Hawai'i Island for the year 2017 (DOFAW 2018:14, 16–18), and 227 hunters responded and reported harvesting 1657 game birds on Hawai'i Island for the game bird season from November 2017 to January 2018 (DOFAW 2018:20, 22–26).

### **3.9 Traditional Gathering Practices**

Traditional gathering practices include a broad range of natural resource gathering for subsistence, craftwork and woodwork, medicine, and other needs. Native plants, especially, are still sought after by Native Hawaiians for *lā'au lapa'au*, the practice of Traditional Hawaiian medicine. Prior to European contact, *lā'au lapa'au* was widely practiced, but the introduction of foreign medicine would contribute to the decline of the practice. The tradition has nonetheless survived and continues to this day. *Lā'au lapa'au* practitioners are found throughout the islands and Hawaiian families continue to employ these practices to contribute to their overall health and well-being.

Native plants are also used in the practice of making *lole* (clothes). *Kapa* (commonly known as barkcloth) was the traditional material used to create the fabric for *lole*. The manufacturing of *kapa* was an important cultural practice for women (Furer 1981). Pacific and Hawaiian *kapa* were known for its wide range of colors and the application of watermarks.

### **3.10 Uhau Humu Pōhaku (Stone Construction)**

*Pōhaku* were of great importance to Native Hawaiians (Malo 1951:19). *Uhau humu pōhaku* is the practice of dry-stone stacking. The term references the way rocks were placed in an overlapping fashion to create sturdy structures. Hawaiians employed this method widely, including in the construction of habitation, terrace walls, *heiau*, *ahu*, or cairns. Traditionally, numerous names were used to describe rocks of different sizes and compositions.

## 4.0 Archival Research and History

This chapter provides a cultural contextual overview of archival data and research obtained for the PTA project area. **Section 4.1** presents aspects of the natural environment, cultural landscape, and archaeological sites in the project area and broad geographical area. **Section 4.2** presents an archival history of the project area and broad geographical area from the Traditional Hawaiian period through the present. **Section 4.3** presents a review of ethnographic research studies that have occurred across the project area and broad geographical area.

Numerous studies have been conducted on this area, but very few have utilized Hawaiian language resources and knowledge about this area. There are relevant documents of native testimonies given by kānaka Hawai'i (Hawaiians) who lived on this land. Efforts to identify and include historic accounts, including those from Hawaiian language resources, were a primary focus of this study.

While conducting the research, primary references included, but were not limited to: land use records, including the Hawaiian Land Commission Awards (L.C.A.) records from the Māhele 'Āina (Land Division) of 1848; the Boundary Commission Testimonies and Survey records of the Kingdom and Territory of Hawai'i; and historical texts authored or compiled by – D. Malo (1951); S.N. Haleole (1862-1863); J.P. I'i (1959); Kupahu (1865); S.M. Kamakau (1961, 1964, 1976, 1991); Wm. Ellis (1963); records of the American Board of Commissioners of Foreign Missions (A.B.C.F.M.) (1820–1860); Chas. Wilkes (1845); Alexander & Preston (1892–1894); A. Fornander (1916–1919 and 1996); Isabella Bird (1964); G. Bowser (1880); and many other native and foreign writers. The study also includes several native accounts from Hawaiian language newspapers (compiled and translated from Hawaiian to English by K. Maly), and historical records authored by nineteenth century visitors, and residents of the region.

### 4.1 Archival Research

Archival research was conducted for the natural environment, cultural landscape, and archaeological sites to search for historical recordation of cultural resources, practices, and beliefs that may have occurred in the project area. The results of that research are contained in the following sections.

#### 4.1.1 Natural Environment

Native Hawaiians developed and maintained prosperous and symbiotic relationships with their natural environment, such that “Hawaiian culture does not have a clear dividing line of where culture ends and nature begins” (Maly 2001:1). The practice of identifying and naming various aspects of the natural environment imbued cultural significance into the rains, the winds, and other natural features. Several of these environmental aspects within the PTA project area and broad geographical area are discussed below.

##### 4.1.1.1 Wai

An important element of Native Hawaiian ethnoecology is the identification and use of freshwater resources. Fresh water (wai) is of tremendous significance to Native Hawaiians and is closely associated with many Hawaiian gods, including Kāne.

There are five surface water features within the PTA project area and broad geographical area: Waikahalulu Gulch, Pu'u Ko'ohi Stream, Pōhakuloa Gulch, Pu'u Pōhakuloa Stream, and 'Auwaikekua Gulch. These five surface water features are non-perennial, meaning they do not flow continuously and may only have flowing water after precipitation events. There are three springs located within the broad geographical area on the slopes of Mauna Kea: Hopukani (Houpookāne), Waihū, and Liloe.

#### 4.1.1.2 Rains

Akana and Gonzalez in *Hānau Ka Ua: Hawaiian Rain Names* explain the significance of the rain in Native Hawaiian culture:

Our kūpuna had an intimate relationship with the elements. They were keen observers of their environment, with all of its life-giving and life-taking forces. They had a nuanced understanding of the rains of their home. They knew that one place could have several different rains, and that each rain was distinguishable from another. They knew when a particular rain would fall, its color, duration, intensity, the path it would take, the sound it made on the trees, the scent it carried, and the effect it had on people (Akana and Gonzalez, 2015:xv).

No specific rain names were identified within the project area. **Table 3** presents a selection of known rains that may be associated with broad geographical area.

Rain Name	Definition and Additional Information	Source
Kīhenelehua	Kīhene Lehua means "bundle off Lehua blossoms". Associated with Hāmākua and Maliki, Hawai'i, and with the Pūhenelehua rain	Akana and Gonzalez, 2015:80
Lilinoe	A mist associated with the mountain and cliffs of Hawai'i Island; also the name of a peak on Maunakea, Hawai'i, and the goddess of mists.	Akana and Gonzalez, 2015:162-163
Pupūhale	Pupūhale means "remaining near house". Associated with Hāmākua.	Akana and Gonzalez, 2015:248
Kēhau	Related to hau. Dew and mist associated with Mauna Kea.	Akana and Gonzalez, 2015:73
Lana'ula	Rain associated with Ha'ikū, Hawai'i Island	Akana and Gonzalez, 2015:133
'Ehu	Mist that is lighter than the Uhiwai, Noe, and 'Ohu, but heavier than the 'Ehuehu. Associations throughout Hawai'i.	Akana and Gonzalez, 2015:22
'Ohu	Mist that is lighter than Uhiwai and Noe, but heavier than 'Ehu and 'Ehuehu. Associations throughout Hawai'i.	Akana and Gonzalez, 2015:213

#### 4.1.1.3 Winds

Winds, like rains, can be unique and distinctive to an individual location. The following wind names may be associated with the project area and the broad geographical area.

Wind Name	Definition and Additional Information	Source
Hū'ē'hu	A strong, northwesterly wind. Associations throughout Hawai'i.	Andrews 1922:208
Kī'u Inu Wai	Kiu Inu Wai means "water drinking Kiu". Known as a wind from the mountains known to be cold and strong. Associations throughout Hawai'i.	Andrews 1922:208
Kī'u	A strong, northwesterly wind known to be cold and strong. Associations throughout Hawai'i.	Andrews 1922:298

#### 4.1.1.4 Pu'u

As defined by Pukui and Elbert (1986:358), a pu'u is a "... hill, peak, cone, hump, mound, bulge, heap, pile ...". For the purposes of this CIA, researched pu'u were limited to those shown on historical and modern quadrangle maps and a sample of geological names and place names are included in this study. Pu'u are significant in the Hawaiian culture and are known to be used for cultural ceremony or as burial sites. They are also critical in wayfinding and serve as landmarks for travelers.

A list of pu'u located on State-owned land and the broad geographical area is provided in **Table 8** in **Section 4.1.2.1**. Of the listed pu'u, Pu'u Kapele and Pu'u Ke'eke'e are associated with existing cultural practices and beliefs, as described further in **Section 6.2**.

#### 4.1.1.5 Traditional Plants

This subsection provides an overview of native and traditional plants found at PTA and their associated cultural uses. There are a far greater number of plant resources within the broad geographical area that are not documented in this assessment. This assessment seeks to provide an overview of the plant species present within the project area and broad geographical area that are associated with cultural practices and beliefs.

While there is an extensive body of literature on the traditional uses of plants by Native Hawaiians, the volcanic terrain of the project area created natural limitations on the flora that could survive in such a harsh environment. Nonetheless, the plants present within the project area would have historically allowed for practices associated with the gathering of plants for food, medicine, and spiritual practices.

USAG-HI PTA operates a natural resource program that aims to conserve the area's endangered floral species. Gathering of some plant resources may be limited by existing State and federal laws for protected species, which would place limits on cultural practices even if the Army did not retain State-owned land. Depending on the regulations in place under State or federal laws, these laws may prohibit the use of, or taking, of protected species.

Twelve species of native plants have been documented on State-owned land (USAG-PTA, 2020; USAG-PTA 2022), as detailed below in **Table 5**.

Table 5. Native Plants Documented on State-Owned Land	
Scientific Name	Common/Hawaiian Name
<i>Chenopodium oahuense</i>	‘āweoweo
<i>Myoporum sandwicense</i>	naio
<i>Sophora chrysophylla</i>	māmane
<i>Dodonaea viscosa</i>	Florida hopbush, ‘a‘ali‘i
<i>Sida fallax</i>	‘ilima
<i>Leptecophylla tameiameia</i>	pūkiawe
<i>Euphorbia olowaluana</i>	alpine sandmat, ‘akoko
<i>Osteomeles anthyllidifolia</i>	Hawai‘i hawthorn, ‘ūlei
<i>Dubautia scabra</i>	rough dubautia, kupaoa
<i>Myrsine lanaiensis</i>	lanai colicwood, kōlea
<i>Santalum ellipticum</i>	coastal sandalwood, ‘iliahi a lo‘e
<i>Wollastonia integrifolia</i>	grassland nehe, nehe

Both oral histories and previous studies note the cultural value of flora resources in the area. McCoy and Orr (2012: 24-25) note that ‘ulei may have been eaten, used for dye, and the hardwood of the shrub was used for tool-making. Pūkiawe, ‘a‘ali‘i, naio, kōlea, ‘ohia lehua, māmane, and ‘iliahi were used traditionally in Native Hawaiian culture for the manufacture of wooden tools, dyes, and poisons (Krauss 1993; Abbott 1992).

Because these species also grow at lower elevations and closer to population centers, it is unlikely that these resources were harvested from the Saddle Region for the purposes listed above. It is more likely that these plants were collected for firewood or tool maintenance and repair (i.e., strong levers for quarrying stone, bird-catching poles, etc.) in the event of travel into the Saddle Region to harvest other resources, like birds and lithic materials (Williams et al. 2002; Williams 2002).

In addition to the 12 native plants listed in **Table 5**, there are also 20 native plants that are federally and State-listed on PTA, as shown below in **Table 6**.

Table 6. Protected Plants Documented on Pōhakuloa Training Area		
Scientific Name	Common Name	Federal Protection
<i>Asplenium peruvianum var. insulare</i>	fragile fern	E
<i>Exocarpos menziesii</i> *	heau, 'iliahi	E
<i>Festuca hawaiiensis</i> *	Hawaiian fescue	E
<i>Haplostachys haplostachya</i> *	honohono	E
<i>Isodendrion hosakae</i>	aupaka	E
<i>Kadu coriacea</i> *	kio'ele	E
<i>Lipochaeta venosa</i>	Spreading nehe	E
<i>Neraudia ovata</i>	ma'aloa	E
<i>Portulaca sclerocarpa</i> *	po'e	E
<i>Portulaca villosa</i>	'ihi	E
<i>Schiedea hawaiiensis</i>	mā'oli'oli	E
<i>Sicyos macrophyllus</i>	'anunu	E
<i>Silene hawaiiensis</i> *	Hawaiian catchfly	T
<i>Silene lanceolata</i> *	lance-leaf catchfly	E
<i>Solanum incompletum</i> *	popolu kū mai	E
<i>Spermolepis hawaiiensis</i>	Hawaiian parsley	E
<i>Stenogyne angustifolia var. angustifolia</i> *	creeping mint	E
<i>Tetramolopium arenarium var. arenarium</i> *	Mauna Kea pāmakani	E
<i>Vigna owahuensis</i>	O'ahu cowpea	E
<i>Zanthoxylum hawaiiense</i> *	a'e	E
Federal Status: E = Endangered, C = Candidate, T = Threatened		
*Documented on State-owned land		

Several of the protected flora species found in the project area and broad geographical area are associated with cultural practices and beliefs, as detailed below.

*Heau, 'iliahi (Exocarpos menziesii)*

This particular species of heau or 'iliahi of the *Exocarpos* genus is found on Mauna Loa on Hawai'i Island within the project area. 'Iliahi is a native evergreen shrub or tree which is known for its alluring scent. The powder derived from the heartwood of 'iliahi was used by traditional Hawaiians to scent hand-beaten kapa. It has also been noted that Native Hawaiians gathered materials from the 'iliahi tree were used for musical instruments (Krauss 1993). Late in the eighteenth century, it became known across the oceans that 'iliahi was growing in the islands, and Hawaiian sandalwood became a commodity amongst traders, so much so that Kamehameha Nui placed a kapu or protective order on the 'iliahi in order to conserve the tree and its forests. However, as more foreign trade came through Hawai'i, the numbers of 'iliahi trees dwindled and such foreign impact on both the 'āina and Native Hawaiians, between the grueling work of harvesting the wood and focus shifting from traditional livelihood to the trade of this natural resource (Abbott 1992).

*Honohono (Haplostachys haplostachya)*

Honohono is an endemic plant belonging to the mint family. Once found on Kaua'i, Maui, and at Pu'ukapele and Waiki'i on Hawai'i Island, it is now only known to live on Kīpukakālawamauna at 5,200 feet on Hawai'i Island. It has been noted that the endemic honohono was rare even upon the arrival of Captain Cook to the Hawaiian islands, and therefore since that time, collection and study of this plant has not been extensive. However, it can be inferred that, due to its rarity, Native Hawaiians had practical uses for such a plant either for medicine or other daily life (Krauss 1993).

*Ma'aloa (Neraudia ovata)*

Ma'aloa, also known as 'oloa, is one of the plants that was used by Native Hawaiians to make kapa cloth. Its bark was harvested and beaten in a specific manner to create the cloth used for clothing, household items, and other important materials for daily life (Buck 1957). According to scholars Malo and Kamakau, kapa made from ma'aloa is a superior white material. While the practice of making kapa from ma'aloa does not seem to be as common as the production of kapa from the wauke plant, such 'oloa kapa was associated with religious ceremonies, especially in the consecration of a heiau luakini. A very long piece of 'oloa kapa was made by females of the ali'i or chiefly rank, and decorated the ki'i of the heiau, a representation of the god Kū (Abbott 1992). Ma'aloa has also been used in traditional Hawaiian medicine to cure constipation (Chun 1994).

*Po'e (also 'Ihi Mākole) (Portulaca sclerocarpa)*

Po'e was used medicinally by Native Hawaiians. The entire plant of the po'e was mixed with the 'awikiwiki vine and the bark of the 'ōhi'a 'ai (mountain apple). The mixture was then pounded, water was added, and the entirety was strained and heated. Upon cooling, it was applied as a salve to treat itchy skin or skin disorders (Krauss 1993).

### *‘Ihi (Portulaca villosa)*

The ‘ihi, related to the ‘ihi mākole above, is an endemic plant, and a member of the Purslane family, variants of which were used medicinally with other lā‘au to treat asthma, PMS, and joint pain (Leonard, 1998).

### *Pōpolo Kū Mai (Solanum incompletum)*

Native Hawaiians traditionally used the berries of the pōpolo kū mai to make a dark purple dye (Krauss 1993). As traditional practices are revived, many practitioners of the fiber arts use pōpolo today to dye their kapa and other materials.

#### 4.1.1.6 Native Birds

**Table 7** provides a list of the protected native bird species found within the project area and broad geographical area. Thereafter, an overview is provided of the cultural association with the species, if any.

Table 7. Federally Listed Endangered or Threatened Animals Observed at Pōhakuloa Training Area				
Scientific Name	Common Name	Federal Protection	State Protection	TYPE
<i>Asio flammeus sandwichensis</i> *	Pueo, Hawaiian short-eared owl,		E	
<i>Branta sandvicensis</i> *	Nēnē, Hawaiian Goose	T	E	Bird
<i>Buteo solitaires</i> *	‘Io, Hawaiian Hawk		E	Bird
<i>Pterodroma sandwichensis</i>	‘Ua‘u, Hawaiian Petrel	E	E	Bird
<i>Oceanodroma castro</i>	Band-Rumped Storm Petrel	E	E	Bird
<i>Lasiurus cinereus semotus</i>	‘Ōpe‘ape‘a, Hawaiian hoary bat	E	E	Mammal
Federal and State Status Key: E = Endangered, C = Candidate, T = Threatened				
* Observed on State-owned land				
Source: <i>Army Training Land Retention at Pōhakuloa Training Area Draft Environmental Impact Statement</i>				

### *‘Io (Buteo solitaires)*

The ‘io, or the *Buteo solitaires*, is the endemic and endangered hawk currently found on the island of Hawai‘i. It is one of two birds of prey native to Hawai‘i. The ‘io generally has two distinct phases of color—the adult dark phase which is usually a blackish brown, and a light phase which is mostly buff with some variations. The adult male ‘io have been measured at 15.5 inches and the adult females at

18 inches. 'Io nests are large structures built of twigs and sticks, usually secured in low-lying branches of 'ōhi'a trees (Munro 1944).

According to multiple sources, the 'io was considered sacred to some families, perhaps an 'aumakua or a deified ancestor. The lofty heights to which it would fly made the 'io a symbol of royalty. For that reason, the name 'Iolani, or royal hawk, was given to people or places of royal status, including Kamehameha IV Alexander 'Iolani Kalanikualiholiho. It has been noted that the feathers of the 'io were used by Native Hawaiians in kāhili feather standards, and were likely not eaten (Handy and Handy 1991). It is also believed that the 'io was associated with the god Kū, who could take the shape of an 'io (Krauss 1993).

#### *Nēnē (Branta sandvicensis)*

The nēnē, or *Branta sandvicensis*, is the Hawaiian goose endemic to the Hawaiian islands and is known to be found on both Maui and Hawai'i Island, especially the northwestern slope of Hualālai in North Kona in the late 1800s. Its Hawaiian name comes from the word nē, the whispering sound of a persistent murmur, calling upon the sound the large fowl makes. The nēnē prefers to forage for its food on the mountains of Hawai'i Island and Haleakalā, and moves down towards the lowlands to breed. Its breeding season is between August and April, and it is reported that they prefer to return to the same nest year after year. It is purported that the nēnē would migrate between Maui and Hawai'i, and sometimes stray off course to the other Hawaiian islands (Munro 1944). Nēnē are known to eat 'ōhelo and pūkiawe berries, and nestle in the pūkiawe (Kepler 1998). These geese were the larger of the Hawaiian birds, and thus its longer feathers were used to make large ceremonial feather standards or kāhili. David Malo also documents that nēnē were among the birds used for food in traditional times (Buck 1957). Once listed as an endangered species in 1967, the success of recovery programs has allowed this rare bird to be taken off the list in 2019 and is now considered a threatened species. Ethnographic data expressed concern for the nearby Keauhou Ii Nēnē Sanctuary located at the base of Hualālai.

#### *'Ua'u (Pterodroma sandwichensis)*

The 'ua'u is the *Pterodroma sandwichensis* petrel, an endangered and endemic sea bird. Currently, the majority of known 'ua'u nests on Hawai'i Island are located at Hawai'i Volcanoes National Park or on the lower slopes of Mauna Loa. From a distance, it appears to have a white head, but its forehead, cheeks and underparts are white and the rest of its head is black. The rest of its body is dark brown, and has been measured at 15.5 inches long. It is likely that the 'ua'u did not roam far from the main Hawaiian islands, and has been threatened by mongoose and feral pigs and cats. The 'ua'u nests in holes under the roots of trees and stones, usually at elevations of 1,500 to 5,000 feet. Its nesting season is between April and May. Despite some reports that the birds were used as food, there are other accounts of 'ua'u as 'aumākua, considered sacred to particular families.

### ***Bird Catching***

Bird catching likely occurred in broad geographical area. Bird catching was conducted by the lawai'a manu or kia manu (bird catchers). Their knowledge of the mountain lands, trails, shelters, and resources was widely valued throughout the nineteenth century, and the bird catchers often served as guides. Several traditional accounts describe the methods of catching native birds to collect their feathers or birds which were considered delicacies in the Hawaiian diet. Several methods of bird catching were widely practiced by Native Hawaiians. Maly (2005:32-38) aggregates and presents an extensive body of resources illustrating the practice. Accounts from the later period in the life of

Kamehameha I reported that, as a result of growing commercial activities in the islands, traditional methods of harvesting resources and catching birds were changing (Kamakau, 1961; Emerson, 1895).

Malo (1951) wrote: “The feathers of birds were the most valued possession of the ancient Hawaiians. The feathers of the mamo were more choice than those of the o-o because of their superior magnificence when wrought into cloaks (ahu). The plumage of the iwi, apa-pane and amakihi were made into ahu-ula, cloaks and capes, and into mahi-ole, helmets” (76). **Figure 5** is an image of an ‘ahu’ula.

While researching various ethnographic records on the Bernice Pauahi Bishop Museum, Maly (2005: 38-40) reviewed Hawaiian language papers (handwritten and typed) collected by island historian, Theodore Kelsey. Kelsey was born in Hilo in the late 1800s and collected the stories of Hawaiian elders and translating their writings. Among his papers found at the Bishop Museum (BPBM Archives – SC Kelsey; Box 1.5) are notes on various aspects of Hawaiian culture, including bird catching. Kelsey’s informant was the elder Reverend Nālimu, who shared his account of bird catching, both as a means of providing feathers used for making Hawaiian emblems of royals and as a food source with other birds. The account specifically references localities in the uplands of the Hilo District and is a first-hand description of traditional or customary practices which had broad application in the mountain regions.



**Figure 5.** ‘Ahu’ula (cloak), circa 1800, Hawai’i, maker unknown. Gift of Lord St Oswald, 1912. CC BY-NC-ND 4.0. Te Papa (FE006380) <https://collections.tepapa.govt.nz/object/91240>

## 4.1.2 Cultural Landscape

“Cultural landscape,” as used in the current study, refers to a geographical area whereby cultural beliefs and practices are expressed tangibly and intangibly on a physical landscape. Much like the named elements of the natural environment in the previous section, the elements discussed in this section help facilitate identification of cultural resources, practices, and beliefs that may be directly or indirectly associated with a project area and/or its broad geographical area.

### 4.1.2.1 Inoa ‘Āina (Place Names)

Inoa ‘āina (place names) reveal the history of place, people, and the depth of their traditions. Although fragmented, the surviving place names describe a rich culture. The occurrence of place names demonstrates the broad relationship of the natural landscape to the culture and practices of the Hawaiian people. In “A Gazetteer of the Territory of Hawaiian,” Coulter observed that Hawaiians had place names for all manner of features, ranging from “outstanding cliffs” to what he described as “trivial land marks” (1935:10). In 1902, W.D. Alexander, former Surveyor General of the Kingdom (and later Government) of Hawai‘i, wrote an account of “Hawaiian Geographic Names.” Under the heading “Meaning of Hawaiian Geographic Names” he observed:

It is very difficult, if not impossible, to translate most of these names, on account of their great antiquity and the changes of which many of them have evidently undergone. It often happens that a word may be translated in different ways by dividing it differently. Many names of places in these islands are common to other groups of islands in the South Pacific, and were probably brought here with the earliest colonists. They have been used for centuries without any thought of their original meaning... (Alexander, 1902:395)

This assessment referenced historical maps to identify place names across the project area and broad geographical area. These maps are presented in **Figure 6**, **Figure 7**, and **Figure 9**. **Table 8** provides a summarized list of pu‘u referenced from the maps (but excludes those pu‘u which are on the summit area or windward face of Mauna Kea, as these areas are outside the broad geographical area of the study).

<b>Pu‘u on State-owned Land</b>	<b>Pu‘u on Government-owned Land</b>	<b>Pu‘u in Broad Geographical Area</b>
Pu‘u Ahi	Keamuku	Koko‘olau
Pu‘u Kapele	Mahoelua	Pu‘u Ahumoa
Pu‘u Ke‘eke‘e	Na Pu‘u Kulua	Pu‘u Haiwahine
Pu‘u Ko‘ohi	Naohuele‘elua	Pu‘u Manao
Pu‘u Koko	Pu‘u He‘ewai	Pu‘u o Kau
Pu‘u Mau‘u	Pu‘u Papapa	Pu‘u o Kauha
Pu‘u Kea	Pu‘u Pohakuloa	Pu‘u Koli
		Pu‘u Ulaula

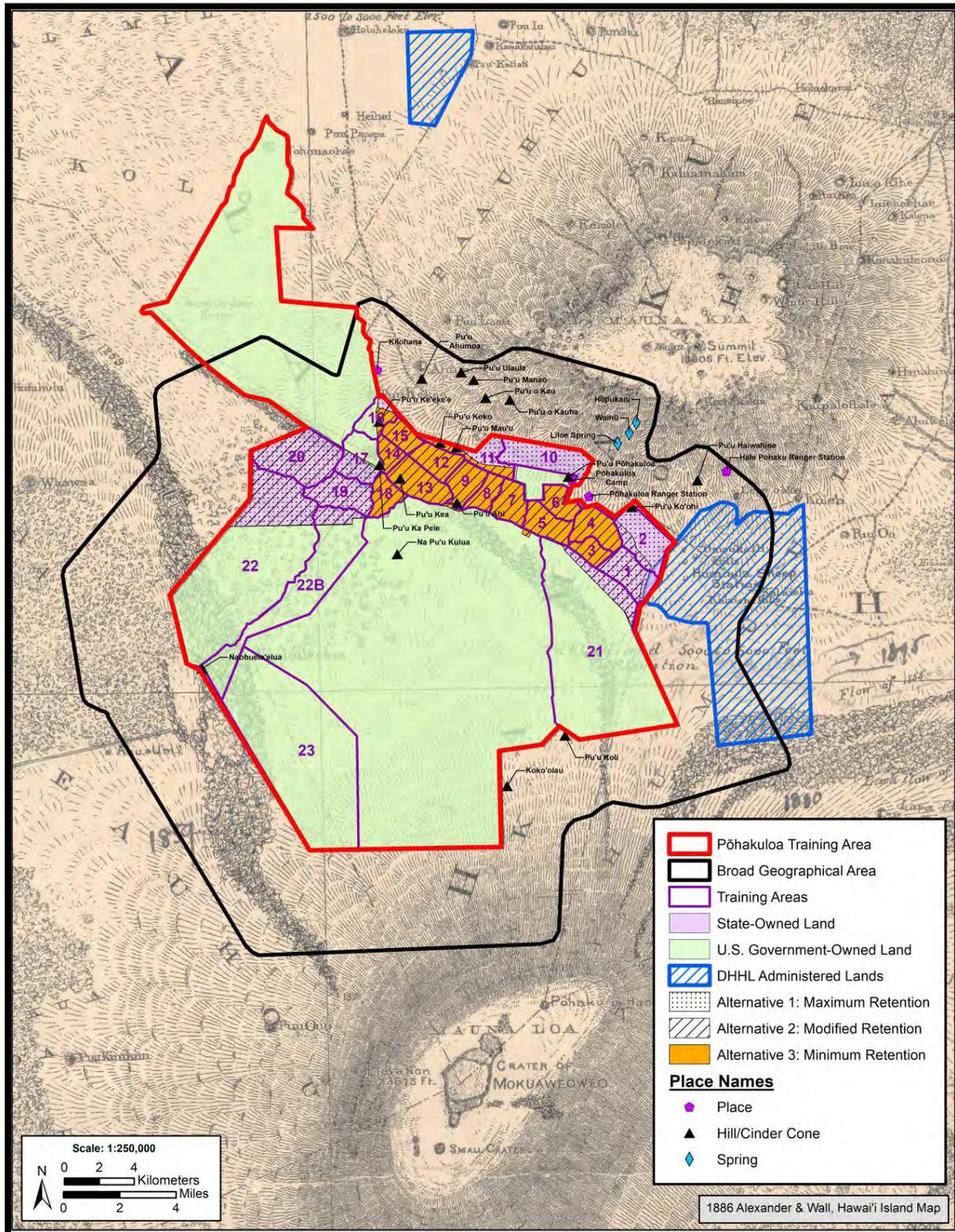


Figure 6. Wall, W.A. and Alexander, W.D. (1886)

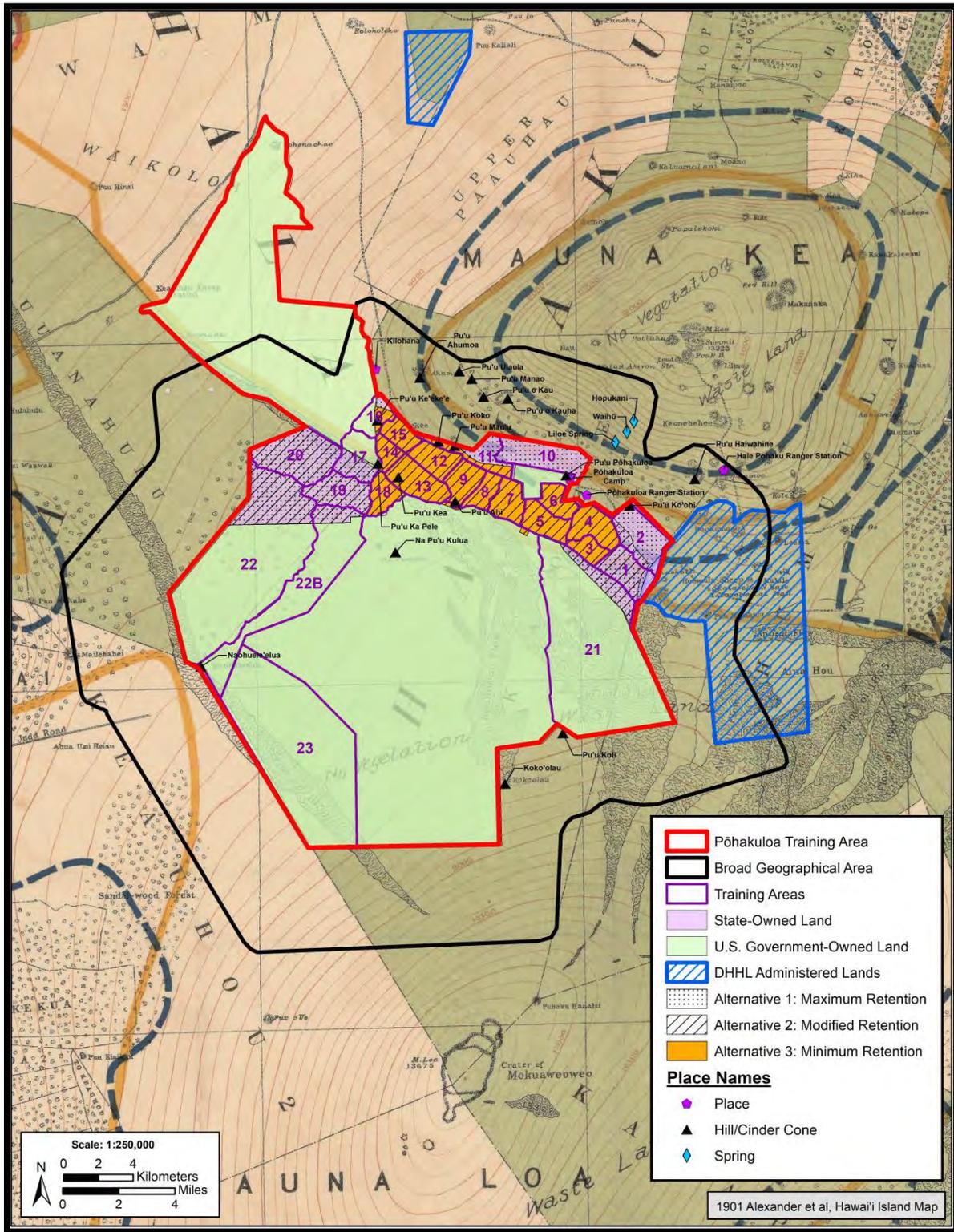


Figure 7. Donn, John M. et al. (1901)

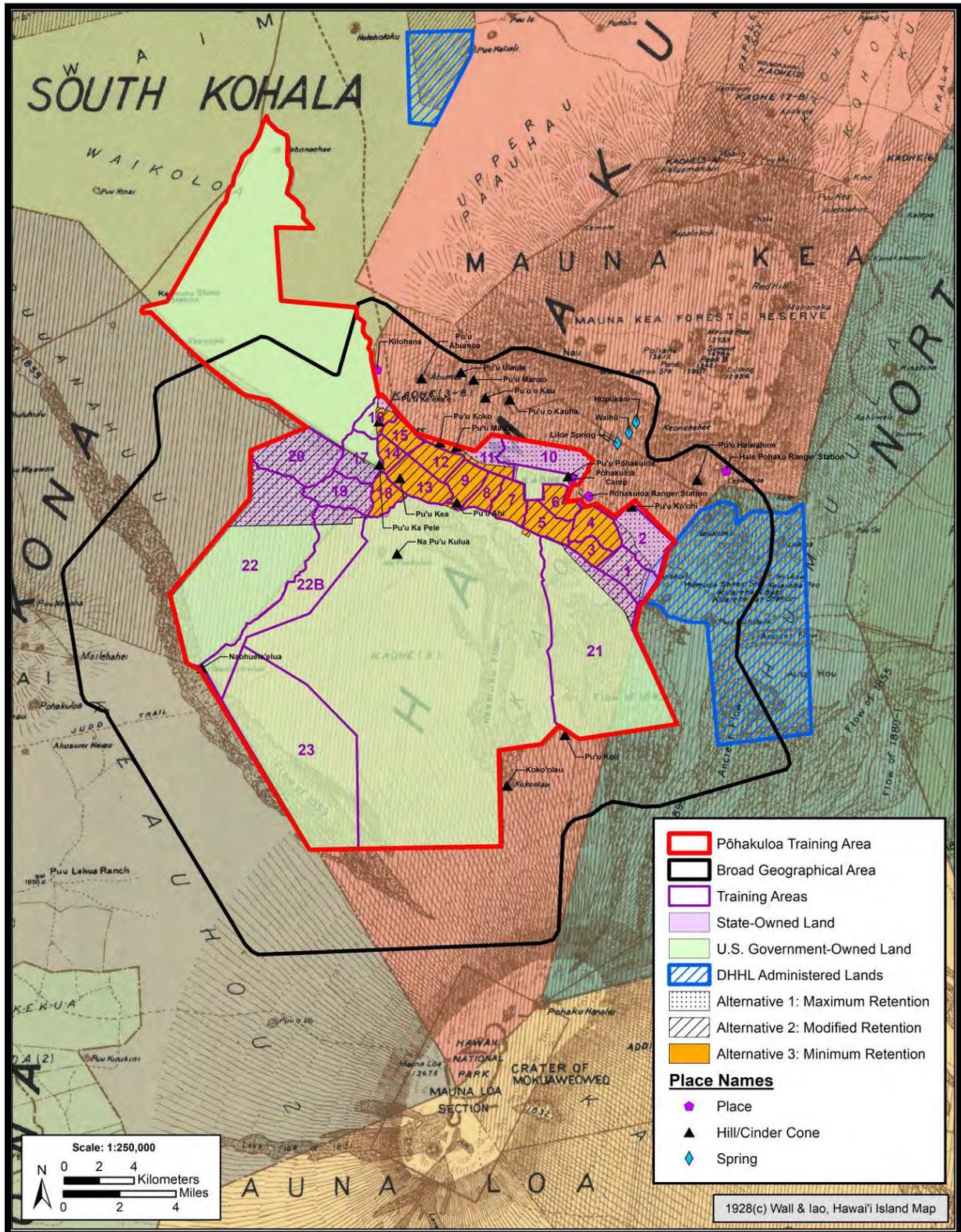


Figure 8. Wall, Walter E. (1928)

#### 4.1.2.2 *Mo'olelo, Oli, and 'Ōlelo No'eau*

The following subsections detail selected mo'olelo, 'ōlelo no'eau, and oli associated with the broad geographical area or the project area.

##### ***Queen Emma's Ascent of Mauna Kea (1882)***

One of the significant historical accounts of travel across the 'āina mauna to Mauna Kea is associated with a journey made by the Dowager Queen Emma (Rooke) Kaleleonālani in 1882. It is an important account, as it is still discussed by the descendants of participants in the trip, some of whom carry names commemorating the journey, and because it is also celebrated in a number of mele (chants).

The trip of Queen Emma to Mauna Kea to conduct a ceremonial bath in Waiau is one of significant symbolism. It is believed that the Queen sought to demonstrate her lineage and godly connections, and to perform a ceremonial cleansing in the most sacred waters of Kāne. The mele composed as a result of the trip refer to Mauna Kea as the piko of Wākea, and also reference a number of named places on this cultural landscape including Ahumoa, Waiki'i, Pu'u Mau'u, Pu'u Kapele, and Kalai'eha. Other Haku mele (composers of chants and songs), recounted the events, scenery, and significance of the journey in a series of mele. A number of these mele are housed in the collection of the BPBM, and have been published in *He Lei no 'Emalani* (2001). Selections from the collection of mele – one, directly from the museum collection (translated by Maly in 2000), and the others published in 2001 – focusing on places visited on and around Mauna Kea, follow below. The translations from *He Lei no 'Emalani* were prepared by Mary Kawena Pukui, Theodore Kelsey, and M. Puakea Nogelmeir (2001). Annotations have been added at a few lines where place names of Mauna Kea and the 'āina mauna occurred and were not recognized as such at the time of publication.

#### 1882

##### **He Inoa Pii Mauna no Kaleleonalani (Na Kaniu Lumaheihei o Kapela i haku)**

##### **In the Name of Kaleleonalani, Ascending the Mountain (Composed by Kaniu Lumaheihei Kapela)**

*Kaulana ke anu i Waikii*

Famous is the cold of Waiki'i,

*Oo i ka ili o ka Lani*

Piercing the skin of the Chiefess.

*E aha ana la Emalani*

What is it that Emalani is doing?

*E walea a nanea ae ana*

Relaxing and enjoying,

*I ka leo hone o ka Palila*

The sweet voices of the *Palila*,

*Oia manu noho Kuahiwi*

Those birds that dwell upon the  
Mountain

*Kikaha o ka Iwi-Polena*

The 'Iwi-polena soars overhead,

*Ko Hoa ia e like ai*

It is like your companion.

<i>Hoolulu Kapena Kaulani</i>	Captain Kaulani called us to shelter,
<i>Ina ae hoi kakou</i>	If we should continue.
<i>Kaalo ana Ahumoa mamua</i>	We then passed before Ahumoa,
<i>A kau i ke one heehee</i>	Rising to the sliding cinders (Onehehe'e).
<i>A imua, a i hope o ka Lani</i>	The Chiefess moved forward and backwards.
<i>He ihona loa ana Kilohana</i>	Descending the length of Kilohana.
<i>Noho ana o Pumauu i ka lai</i>	Pu'u Mau'u sits in the calm,
<i>Au mai ana o Puukapele</i>	Pu'ukapele juts out,
<i>Kaala i kuu maka ke aloha</i>	My eyes rise up with love.
<i>Komo i ka olu o Kalaieha</i>	We entered the cool of Kalaieha,
<i>Eia mai ke Kuini Emalani</i>	Here is Queen Emalani
<i>Ua wehe i ka pua mamane</i>	The blossom of the māmane has opened.
<i>E o ke Kuini Emalani</i>	Respond Queen Emalani
<i>Kaleleonalani he Inoa</i>	Kaleleonalani is the name.

[BPBM Archive, Mele Collection, call #fHI.M50; Maly, translator]

### ***He Moolelo Kaa Hawaii no Laukaieie (1894)***

"He Moolelo Kaa Hawaii no Laukaieie..." (A Hawaiian Tradition of Laukaieie) was published in *Nupepa Ka Oiaio* between January 5, 1894, and September 13, 1895. The mo'olelo was submitted to the paper by Hawaiian historian Moses Manu. The mo'olelo recounts the travels of Pūpū-kani-'oe and her companions.

The following narrative, translated by Kepā Maly, have been excerpted from the mo'olelo.

#### **March 9, 1894**

Pūpū-kani-'oe and her companions from Lehua and Ka'ula sailed in their canoe, passing Kaho'olawe, guided by the sharks of those waters. They entered the channel of 'Alenuihāhā and her companions, who had never before seen Hawai'i, saw the mountains of Mauna Kea, Maunaloa and Hualālai rising above. Ka-welone-a-ka-lā-i-Lehua inquired of Pūpū-kani-'oe the names of those places on Hawai'i. She answered, telling them that they were the mountains on which dwell the women who wear the

kapa hau (snow garments) and who covered the lands down to where the woods were found. Pūpū-kani-'oe then chanted:

<i>Ma'ema'e i ka hau ka luna o Mauna Kea,</i>	Pure as the snows atop Mauna Kea
<i>Ōpū iho la iluna o ka hinahina,</i>	Little clumps settled upon the hinahina
<i>Ka pua luhiehu a ka māmane,</i>	Adorned with the blossoms of the māmane,
<i>He lama wale ala no ke ike aku,</i>	It looks like a light when seen,
<i>Aloha mai nei hoi ka Aina...</i>	There is such love for the land...

### ***Warriors Traveled the Mountain Paths and Met in Battle on the 'Āina Mauna***

Among Kamakau's traditions are found the history of Keawe-nui-a-'Umi and his brother Ke-li'i-o-Kaloa, who shared the rule over Hawai'i. When it was learned that Ke-li'i-o-Kaloa was abusing his people, Keawe-nui-a-'Umi determined to depose Ke-li'i-o-Kaloa. The warring parties traveled across the mountain lands, with Keawe-nui-a-'Umi's war parties marching from Hilo, Puna, and Ka'ū across the plateau between Mauna Kea and Mauna Loa, towards 'Ahu-a-'Umi, the temple built by his father. Kamakau reported:

When Keawe-nui-a-'Umi learned of the unjust rule of Ke-li'i-o-kaloa and the burdening of the common people, he was filled with compassion for the chiefs and commoners of Kona. Therefore he made himself ready with his chiefs, war lords, war leaders, and warriors from Hilo, Puna, Ka-'u to make war on Kona. The war parties [met] at the volcano (pit of Pele) before going on to battle along the southern side of Mauna Kea and the northern side of Mauna Loa. The mountain road lay stretched on the level. At the north flank of Hualalai, before the highway, was a very wide, rough bed of lava – barren, waterless, and a desert of rocks. It was a mountain place familiar to 'Umi-a-Liloa when he battled against the chiefs of Hilo, Ka-'u, and Kona. There on that extensive stretch of lava stood the mound (ahu), the road, the house, and heiau of 'Umi.<sup>4</sup> It was through there that Keawe-nui-a-'Umi's army went to do battle against his older brother, Ke-li'i-o-kaloa.

When the chiefs of Kona heard that those of Hilo were coming by way of the mountain to do battle, Ke-li'i-o-kaloa sent his armies, but they were defeated by the armies from Hilo. The armies of Kona were put to flight. When the armies of Hilo reached the shore of Kona the war canoes arrived from Ka-'u and from Hilo. The battle was [both] from the upland and from the sea. Ke-li'i-o-kaloa fled and was killed on a lava bed. The spot

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<sup>4</sup> It is reached "by a fourteen mile journey from Holualoa up the old Judd trail, or by an eighteen or twenty mile trip from Kealakekua, via Pu'ulehua and Kanahaha... It is on the slope of Hualalai, at between 4,500 and 5,000 feet elevation, with Mauna Kea and Mauna Loa towering snow-clad, much farther away."

where he was killed was called Pu'u-o-Kaloa (Kaloa's hill), situated between Kailua and Honokohau... (Kamakau, 1961:35-36; M.K. Pukui, translator)

In the next generation, Lono-i-ka-makahiki, grandson of 'Umi-a-Liloa, was also called upon to battle, this time against the invading forces of the Maui chief, Kama-lālā-walu. Once again, the warriors of Hawai'i made use of the mountain land trails to meet the final challenge on the plains of Waimea. The warriors from Ka'ū, Puna, and Hilo districts passed by Mauna Kea to join in the battle below Pu'u 'Oā'oaka, in Waimea:

Kama-lala-walu, the heedless chief, paid no attention, but followed the advice of two old men of Kawaihae who counseled falsely. One of them was name Puahu-kole. They said, "Pu'uoa'oaka is a good battlefield and will be a great help to the chief. All the canoes should be taken apart because the warriors may desire to run back to the canoes and depart in secret for Maui. The best thing to do is to cut up the canoes and outriggers, for there are canoes enough in Hawaii. When it is conquered, there will be many canoes from Kona and Ka-'u. There will be much property and wealth for the Maui chiefs." The chief, Kama-lala-walu, listened to the advice of Puhau-kole and his companion. Their suggestions were carried out, and the canoes were broken up. Then Kama-lala-walu's fighting men went up to the grass-covered plain of Waimea.

After Kama-lala-walu's warriors reached the grassy plain, they looked seaward on the left and beheld the men of Kona advancing toward them. The lava bed of Kaniku and all the land up to Hu'ehu'e was covered with the men of Kona. Those of Ka-'u and Puna were coming down from Mauna Kea, and those of Waimea and Kohala were on the level plain of Waimea. The men covered the whole of the grassy plain of Waimea like locusts. Kama-lala-walu with his warriors dared to fight. The battlefield of Pu'oa'oaka was outside of the grassy plain of Waimea, but them of Hawaii were afraid of being taken captive by Kama, so they led to the waterless plain lest Maui's warriors find water and hard, waterworn pebbles. The men of Hawaii feared that the Maui warriors would find water to drink and become stronger... (Kamakau, 1961:58; M.K. Pukui, translator)

### ***Travel Across the 'Āina Mauna in the Time of Kamehameha***

Stephen Desha, Sr., editor of *Ka Hoku o Hawaii*, and a group of his peers published many historical accounts for the education of Hawaiian readers in their native history. One account, "He Moolelo Kaa no Kekūhaupio, Ke Koa Kaulana o ke Au o Kamehameha ka Nui" (A Tradition of Kekūhaupio, the Famous Warrior in the time of Kamehameha the Great), describes the time leading up to Kamehameha's securing his rule over the island of Hawai'i and was published from December 16, 1920, to September 11, 1924, in *Ka Hoku o Hawaii* (Desha, 2000; Frazier, translator). When Kamehameha (Pai'ea) inherited the god Kūkā'ilimoku from Kalani'ōpu'u, there was dissension among some of the chiefs. Fearing that treachery might arise, Kekūhaupi'o traveled with Kamehameha from Ka'ū towards Kīlauea, to 'Ōhaikea, and then went on to Mauna Kea and Lake Waiau, where Kamehameha made a ceremonial offering:

...When Pai'ea had completed the ceremonial offering, Kekūhaupi'o encouraged them to go, as it was not known what secret harm might come after them, as some of the chiefs had treacherous thoughts. Because of this thought by Kekūhaupi'o he directed them to leave the customary pathway, and to travel where they could not be followed. They

climbed straight up from that place to a certain part of Mauna Loa and came down seaward at a certain part of Ka'ū named Ōhaikea. They spent the rest of that night in a cave called Alanapo. The next morning, after Kamehameha had made his ceremonial offering and prayer to Kūkā'ilimoku, they left that place and climbed up another mountain trail till they reached the summit of Mauna Kea. At a place close to Lake Waiau, Kamehameha again made an offering. They were unable to remain there for long because of the cold, and so they descended to Waimea at a place called Moana by the ancients, going straight down to the wide plain of Waimea... (Desha, 2000:93-94)

Following the battle of Moku'ōhai ca. 1782, reference to travel across the 'āina mauna was again made. Kamakau reported that the sacred chief, Keawemauhili, his wife, Ululani, and their daughter, Kapi'olani, traveled from Kona to the uplands, across Mauna Kea, and down to Pā'auhau (1961:122). Desha (2000) elaborated on the account, by which the small party traveled for safety, to the mountain lands, passing the slopes of Mauna Kea and continued on the mountain trail to Hilo.

After the battle ended at Moku'ōhai, Keawemauhili and his family were held captive and transported to the Kaumalumu section of Kona. Then, with the help of faithful friends, they escaped, traveling to the uplands of Kona, past Mauna Kea, and on to Hilo. It was reported:

...Keawemauhili, Ululani his wife, and their small daughter Kapi'olani were secretly helped to flee. They were taken to Kaumalumu, North Kona, by Kaleipaihala as ordered by the ilāmuku Kanuha. When Keawemauhili went ashore at that place of North Kona, he sought escape for them by a mountain trail which ascended to the gap between Hualālai and Mauna Kea, taking that path in order to arrive at their home in Hilo. The pathway was very tangled with forest growth. There were five of them on this journey, with Keawemauhili choosing the way, and Ululani following her husband, and the kahu [servants] who were carrying Kapi'olani. There were many impediments in the path but the important thing was to survive. The chill and bitter rain and entanglement of ferns and other obstructions were disregarded. At times Ululani carried her beloved daughter because their personal servants were heavily burdened with their bedding which was carried in calabashes on carrying sticks. While they were patiently ascending, Kapi'olani cried because of the strangeness of this mountain way. This grieved the parents of the beloved child but they were unable to help. When they entered into the fern wilderness, Kapi'olani wailed loudly because of this troublesome pathway, causing them to have qualms, because when Kīwala'ō's forces were put to flight, many people had fled into the forest and were being widely sought by the victorious warriors of Kamehameha's side. At this time they were climbing in darkness because they had fled at nightfall. However dawn was breaking at the time they entered the fern wilderness and were pushing through it. When it was full daylight and while they were moving on the mountain trail, the wailing of Kapi'olani was very loud which burdened the minds of Keawemauhili and his wife. At this time, the wails of Kapi'olani guided some of Kamehameha's warriors who were Kohala people, and they met the escapees. The leader of these warriors saw this distinguished man of noble stature, and the thought came to him that this must be the ali'i Keawemauhili of whom they had only heard. The leader said to Keawemauhili: "Stand and speak! Are you perhaps Keawemauhili, the ali'i of the Hilo districts...?" (Desha, 2000:153)

The account is continued with the eventual safe return of Keawemauhili mā to Hilo, and little other mention of the journey over the mountain lands.

### ***The Rivalry between Poli'ahu and Pele***

One of the prominent late historic writers was W.D. Westervelt, who resided in Hawai'i between 1889 and 1939. Westervelt wrote of the conflicts between Pele and Poli'ahu and told them how Poli'ahu came to gain control over the northern portion of Hawai'i, while Pele retained dominance over the arid and volcanically active southern part of Hawai'i. In his tradition of "Pele and the Snow-Goddess," Westervelt reported an eruptive event that took place after Hawaiian settlement (contrary to geological research) of the island group, explaining how Laupāhoehoe and Onomea Arch were formed:

Poliahu... loved the eastern cliffs of the great island of Hawaii – the precipices which rise from the raging surf which beats against the coast known now as the Hamakua district. Here she sported among mortals, meeting the chiefs in their many and curious games of chance and skill. Sometimes she wore a mantle of pure white kapa and rested on the ledge of rock overhanging the torrents of water which in various places fell into the sea... (1963:55)

Westervelt then wrote that once, Poli'ahu and her companions were competing in the sport of hōlua (sledding) on the slopes of Mauna Kea, south of Hāmākua. There appeared among them a beautiful stranger, who was invited to participate in the sport with them. However, the woman instead:

...threw off all disguise and called for the forces for fire to burst open the doors of the subterranean caverns of Mauna Kea. Up toward the mountain she marshaled her fire-fountains. Poliahu fled toward the summit... Soon she regained strength and threw the [snow] mantle over the mountain... the lava chilled and hardened and choked the flowing, burning rivers... The fire-rivers, already rushing to the sea, were narrowed and driven downward so rapidly that they leaped out from the land, becoming immediately the prey of the remorseless ocean.

Thus the ragged mass of Laupāhoehoe was formed, and the great ledge of the arch of Onomea, and the different sharp and torn lavas in the edge of the sea which mark the various eruption of centuries past (Westervelt, 1963:61-63).

Through these mo'olelo, the practice of hōlua becomes associated with the broad geographical area, which is closely associated with the deities of the area (i.e., Pele, Poli'ahu, Lilinoe, Kahoupokane, Waiiau).

### ***'Ōlelo No'eau***

'Ōlelo no'eau are another source of cultural information about the area and a form of mo'olelo, as they are oral traditions passed down through Hawaiian pedagogy. 'Ōlelo no'eau means "wise saying," and encompasses a wide variety of literary techniques and multiple layers of meaning common in the Hawaiian language. Considered to be the highest form of cultural expression in old Hawai'i, and still considered as such today, 'ōlelo no'eau provide understanding of the everyday thoughts, customs, and lives of those that created them.

The 'ōlelo no'eau presented here relate to land divisions near the project area that may give insight to knowledge about and Hawaiian cultural value and perspectives regarding the location. These 'ōlelo no'eau are found in Pukui's *'Ōlelo No'eau: Hawaiian Proverbs & Poetical Sayings* (1983).

- Poli'ahu, ka wahine kapa hau anu o Mauna Kea ('Ōlelo No'eau # 2687)

*Poli'ahu, the woman who wears the snow mantle of Mauna Kea; Poli'ahu is the goddess of snows; her home is on Mauna Kea.*

- Mauna Kea, kuahiwi ku ha'o i ka mālie ('Ōlelo No'eau # 2147)

*Mauna Kea standing alone in the calm*

- E ho'i na keiki oki uaua o na pali ('Ōlelo No'eau # 288)

*Home goes the very tough lads of the hills; These lads of the hills were the cowboys of Pu'uwa'awa'a and Pu'uanahulu, who were well known for their endurance*

- Hele a 'ilio pī'alu ka uka o Hāmākua ka lā. ('Ōlelo No'eau # 728)

*Like a wrinkled dog is the upland of Hāmākua in the sunlight; An uncomplimentary remark about an aged, wrinkled person. Line from a chant.*

- Ka ua kīhene lehua o Hāmākua. ('Ōlelo No'eau # 1568)

The rain that produces the lehua clusters of Hāmākua.

#### 4.1.2.3 Mele

Honua Consulting completed searches of mele associated with the project area and larger geographical area (Elbert and Mahoe, 1970).

#### ***“Pōhakuloa” by Gary Haleamau and Keala H. Lindsey***

Pōhakuloa nānea ia  
Pōhakuloa nahenahe mai, nahenahe mai

Ke ola mau loa me ke aloha  
Pōhakuloa nahenahe mai, nahenahe mai  
Pōhakuloa me Mauna Kea  
me Mauna Loa nahenahe mai, nahenahe mai

Pōhaku pahoe hoe pōhaku Pele  
Ala nui ki kie kie nānea ise mālie, nānea ise mālie

Hā'ina 'ia mai ana ka puana  
Pōhakuloa nahenahe mai, nahenahe mai  
Hā'ina 'ia mai ana ka puana  
Pōhakuloa nahenahe mai

The mele conveys Pōhakuloa's still, calm, and peaceful environment situated between Mauna Kea and Mauna Loa. Pōhakuloa was also known to be the road traveled and frequented by the goddess Pele as written in the fourth verse. The composers reference the different types of lava flow left by Pele along the roadway.

***“Pu’u Huluhulu” by Eliza Ha’aeo***

Ho’omakaukau ko kaula ‘ili	Make ready your lariat
I luna o ka pu’u Kanakaleonui	Put it over the throat, of the man with the big voice
Ho’olohe i ke kani o nā manu	Heed the cry of birds
O never mind ua hina pū ua hiki nō	Never mind, you will fall, it is done
O never mind ua hina pū ua hiki nō	Never mind, you will fall, it is done
O ‘oe ka i huia ihola	You are the one who was met
Ka mana’o e pua pua’i ‘ala	My constantly recurring thought
Eia o Pu’uohulu	Here is a group of special people
Ulu nō wau ua hiki nō	I am inspired, it is done
Ulu nō wau ua hiki nō	I am inspired, it is done
I loko o ka ulu la’au	There in the forest,
E ki’i ana i na pipi kuni’ole	Catching the unbranded cattle
Ho’olei i hola ke kaula ‘ili	Caught by the throw of the rawhide rope
O never mind a komo ‘oe a komo’ole	Never mind if you come in or not
O never mind a komo ‘oe a komo’ole	Never mind if you come in or not
Pa’a hola ka pipi kuni’ole	The unbranded steer is held tight
Ho’opili i ke kumu mamani	Bound to the mamane tree
Pa’a hola ka lio i ka alu	The horse holds fast to the slack
O never mind a lilo ‘oe pau ela no	Never mind if it’s lost to you, that’s how it is
O never mind a lilo ‘oe pau ela no	Never mind if it’s lost to you, that’s how it is
Kau mai ka hau o Mauna Kea	The snows settle on Mauna Kea
Ka makani hu’ihu’i ke kino	The cold wind is upon the body
E huli ho’i nei kēia	So this one turns to go back
O never mind a ho’i au a ho’i’ole	Never mind if you return or not
O never mind a ho’i au a ho’i’ole	Never mind if you return or not

This mele is associated with various names including “Kaula’ili”, “Pu’u Huluhulu” or “Pu’uohulu”. This is a mele is about Paniolo on the slopes of Mauna Kea, Mauna Loa, and the Kohala mountains. This area was known to have many barren pu’u, but only one cinder cone was covered in trees. The paniolo referred to the tree covered hill as Pu’uohulu or Pu’uhuluhulu – the hill with the fur.

***“Poli’ahu” by Frank Kawaikapuokalani Hewett***

Wai maka o Poliahu, I ka ‘eha a ke aloha  
 Kaumaha i ka ha’alele, O ‘Aiwohikūpua  
 Anuanu ka ‘iu kēhau, O Mauna Kea  
 A’ohe āna ipo aloha, E ho’opumehana  
 Kau mai ka hali’a aloha, O ka wā mamua  
 Pū’olu ka wai o Nohi, Ku’u mehameha  
 He lei ko aloha, No ku’u kino  
 Pili poli hemo’ole, No nā kau a kau

Hui:

Ho'i mai (e ho'i mai)

E ku'u ipo

E ho'i mai (e ho'i mai)

E pili kāua

E ho'i mai (e ho'i mai 'oe)

E ho'i mai 'oe ē, ē

E ho'i mai 'oe

Poli'ahu is the snow goddess of Maunakea. This mele speaks of 'Aiwohi, a chief from the island of Kaua'i who started a journey to meet the beautiful princess, Lā'ieikawai, in Puna. As such, this mele is associated with the mo'olelo detailed in **Section 4.1.2.2**.

### 4.1.3 Historic Archaeological Sites

Historic and archaeological sites on the State-owned land, as compiled by Kleinfelder/GANDA, are listed and described in the following table (**Table 9**); some sites are identified by their State Inventory of Historic Places (SIHP) numbers. Discussions regarding these sites are provided in the Archaeological Literature Review (**Appendix J** in the EIS) and **Chapter 3** of the EIS. The impact analysis as completed by Kleinfelder/GANDA is also included in the impact analysis section of this CIA.

Site Number	Location	Description	Period
50-10-31-5002	TA 5	Ranch wall	Historic
50-10-31-5003	TA 6	Habitation lava tube	Traditional
50-10-31-5009	TA 17	Trail	Traditional
50-10-31-14638	TA 5	Habitation lava tubes, rectangular house foundation, artifact scatter, pavement	Traditional
50-10-31-19490	TA 5	Habitation lava tubes, trails, C-shape	Traditional
50-10-30-19509	TA 22	Habitation lava tube	Traditional
50-10-30-19529	TA 22	Habitation lava tube	Traditional
50-10-31-21351	TA 5	Lithic workshop complex	Traditional
50-10-31-21744	TA 5	Lithic scatter	Traditional
50-10-31-21745	TA 5	Habitation lava blister	Traditional
50-10-31-21746	TA 4	Mound/excavation complex	Unknown
50-10-31-22941	TA 4	Lava blisters	Traditional
50-10-31-23450	TA 15	Habitation, overhang shelter, artifact scatter, pictographs	Traditional
50-10-31-23452	TA 1, 3-9, 13, 14, 16, 17	Ranching fence line	Historic

**Table 9. Historic and Archaeological Sites on State-owned Land**

Site Number	Location	Description	Period
50-10-31-23455	TA 5	Pāhoehoe pits	Traditional
50-10-31-23456	TA 5	Possible habitation enclosure	Traditional
50-10-31-23457	TA 7	Trail	Traditional
50-10-31-23462	TA 7	Cairn	Unknown
50-10-31-23562	TA 5	Habitation lava tube	Traditional
50-10-31-23563	TA 5	Modified outcrop/wall	Traditional
50-10-31-23565	TA 5	Volcanic glass quarry	Traditional
50-10-31-23566	TA 5	Habitation lava tube	Traditional
50-10-31-23568	TA 5	Habitation lava tube	Traditional
50-10-31-23572	TA 5	Habitation complex	Traditional
50-10-31-23575	TA 5	Habitation lava blister	Traditional
50-10-30-23694	TA 22	Lava tube and burial	Traditional
50-10-31-23842	TA 1	Habitation platform/terrace	Unknown
50-10-31-23843	TA 1	Enclosure/mound complex	Unknown
50-10-31-23844	TA 1	Mound	Unknown
50-10-31-23845	TA 1	Mound	Unknown
50-10-31-23846	TA 1	Ranching enclosure	Historic
50-10-31-23847	TA 3	Ranching alignments	Historic
50-10-31-23848	TA 3	Mound	Historic
50-10-31-23849	TA 4	Mound	Historic
50-10-31-23850	TA 4	Ranch corral	Historic
50-10-31-23851	TA 4	Habitation lava tube	Unknown
50-10-31-23852	TA 1, 3-9, 13, 14, 16, 17	Rock wall and enclosure	Historic
50-10-31-23853	TA 4	Habitation lava tube	Unknown
50-10-31-23854	TA 3	Volcanic glass quarry	Traditional
50-10-31-23856	TA 4	Pāhoehoe pits	Traditional
50-10-31-24326	TA 7	Blister cave and pit complex	Unknown
50-80-10-24327	TA 7	Cairn	Unknown
50-80-10-24328	TA 7	Wall, C-shape	Unknown
50-10-31-26728	TA 5	Habitation lava tube	Traditional

**Table 9. Historic and Archaeological Sites on State-owned Land**

Site Number	Location	Description	Period
50-10-31-26729	TA 5	Habitation lava tube blister	Traditional
C-020305-01	TA 22	Lava tube	Unknown
C-031705-01	TA 22	Lava tube	Traditional
C-031705-02	TA 22	Lava tube	Traditional
C-031705-03	TA 22	Lava tube	Traditional
C-031705-04	TA 22	Lava tube	Traditional
C-031705-05	TA 22	Lava tube	Traditional
C-031705-06	TA 22	Lava tube	Traditional
PL-PTA-02	TA 21	Volcanic glass quarry	Traditional
PL-PTA-03	TA 21	Volcanic glass quarry	Traditional
PL-PTA-04	TA 21	Volcanic glass quarry	Traditional
PL-PTA-05	TA 21	Volcanic glass quarry	Traditional
PL-PTA-06	TA 21	Volcanic glass quarry	Traditional
PL-PTA-029	TA 21	Volcanic glass quarry and artifact scatter	Traditional
PL-PTA-030	TA 21	Volcanic glass quarry	Traditional
PL-PTA-031	TA 21	Volcanic glass quarry and artifact scatter	Traditional
PL-PTA-032	TA 21	Volcanic glass quarry and artifact scatter	Traditional
PL-PTA-033	TA 21	Volcanic glass quarry	Traditional
PL-PTA-034	TA 21	Volcanic glass quarry	Traditional
PL-PTA-061	TA 21	Volcanic glass quarry and artifact scatter	Traditional
PL-PTA-062	TA 21	Volcanic glass quarry and artifact scatter	Traditional
PL-PTA-063	TA 21	Volcanic glass quarry and artifact scatter	Traditional
PL-PTA-064	TA 21	Volcanic glass quarry and artifact scatter	Traditional
PL-PTA-065	TA 21	Volcanic glass quarry	Traditional
PL-PTA-066	TA 21	Volcanic glass quarry and artifact scatter	Traditional
PL-PTA-067	TA 21	Volcanic glass quarry and artifact scatter	Traditional
PL-PTA-068	TA 21	Volcanic glass quarry and artifact scatter	Traditional
T-012805-02	TA 22	Habitation lava tube	Traditional
T-020305-02	TA 22	Habitation lava tube	Traditional
T-020701-02	TA 6	Artifact scatter	Traditional

**Table 9. Historic and Archaeological Sites on State-owned Land**

Site Number	Location	Description	Period
T-031709-01	TA 18	Mound	Unknown
T-041906-01	TA 22	Habitation lava tube	Unknown
T-041906-02	TA 22	Habitation lava tube	Unknown
T-041906-03	TA 22	Habitation lava tube	Unknown
T-043094-02	TA 22	Habitation lava tube	Unknown
T-043094-03	TA 22	Habitation lava tube	Unknown
T-043094-04	TA 22	Habitation lava tube	Unknown
T-043094-05	TA 22	Habitation lava tube	Unknown
T-050906-01	TA 22	C-shape	Unknown
T-070104-01	TA 5	Artifact scatter	Traditional
T-071306-01	TA 22	Enclosure	Unknown
T-080206-01	TA 1	Enclosure	Unknown
T-082306-01	TA 22	Cairn	Unknown
T-082306-02	TA 22	Modified outcrop	Unknown
T-082306-03	TA 22	Lava tube	Unknown
T-082306-04	TA 22	Pāhoehoe pit	Unknown
T-082306-05	TA 22	Pāhoehoe pit	Unknown
T-092202-01	TA 3	Volcanic glass quarry	Traditional
T-092202-02	TA 3	Artifact scatter	Traditional
T-092202-03	TA 3	Artifact scatter	Traditional
T-092202-04	TA 3	Artifact scatter	Traditional
T-092202-05	TA 3	Artifact scatter	Traditional
T-092899-01	TA 22	Habitation lava tube	Traditional
T-100606-01	TA 22	Mound	Unknown
T-100606-02	TA 22	Mound	Unknown
T-111402-01	TA 3	Artifact scatter	Traditional
T-111402-02	TA 3	Volcanic glass quarry	Traditional
T-111402-05	TA 3	Volcanic glass quarry	Traditional
T-111402-06	TA 3	Volcanic glass quarry	Traditional

#### 4.1.3.1 Habitation

While the environment within the Saddle Region was not suitable for permanent habitation, there is clear archaeological evidence and oral histories that indicate the area was used for short-term habitation and shelters for Hawaiians traveling through the area. Lava tubes, in particular, made suitable shelters (**Figure 9** and **Figure 10**), and various artifacts have been found in lava tubes at PTA (**Figure 12**, **Figure 13**, and **Figure 14**).

It was previously established in the 2012 Ethnographic Study and in previous studies that the area “were not inhabited on a permanent basis prior to European contact.... Instead, there is a wealth of data pointing to temporary but repeated uses for different purposes” (McCoy and Orr, 2012: 27, citing McCoy 1991). Langlas et al. also identified “late-prehistoric and historic period occupation caves and trails” (1999: 17, citing Rosendahl, 1977). Langlas et al. also noted “habitation caves in the western portions of the PTA” that were dated in the ranges of AD 900–1700 (1999).



**Figure 9. Habitation Cave, U.S. Army Garrison Pōhakuloa Training Area (2012)**



**Figure 10. Lava tube that was likely used as a shelter, U.S. Army Garrison Pōhakuloa Training Area (2015)**



**Figure 11. Gourd found in a historic site located in a lava tube, U.S. Army Garrison Pōhakuloa Training Area**



**Figure 12. Cooking stones located in a lava tube habitation site, U.S. Army Garrison Pōhakuloa Training Area (2015)**



**Figure 13. Item, speculated to be ho'okupu, an offering, found in a lava tube, U.S. Army Garrison Pōhakuloa Training Area (2015)**

#### **4.1.3.2 Quarrying**

Traditionally, quarrying has occurred throughout the Pacific for various purposes (Burton, 1984). Quarrying for basalt and volcanic glass has already been documented within the broad geographical area, including North Kona near Pu'u Wa'awa'a. McCoy et al. conducted an archaeological study published in 2011 that demonstrated the relationship between localized traditional communities and volcanic glass quarrying. Also important is the conclusion that this resource would be traded with neighboring communities through inter-community exchange (McCoy et al., 2011).

The practice of quarrying was previously established in McCoy and Orr (2012). Of this practice they wrote, "Some areas of PTA, as well as surrounding lands, were heavily quarried by pre-Contact Hawaiians to extract materials for stone tool manufacture". McCoy and Orr identified two types of stone quarried at PTA: volcanic glass and basalt.

Quarrying existed extensively throughout the pae 'āina of Hawai'i. The Mauna Kea region contained an exceptionally high amount of basalt, and to access this valuable resource, people would travel from

across Hawai'i Island. Based on its size of nearly 8 miles, it is believed that the Mauna Kea adze quarry was the primary source of quarried basalt for the entire island.

The adze quarry region can be considered its own cultural landscape and has been identified by practitioners as an important cultural site (Langlas et al., 1999). Radiocarbon dating shows the quarry being utilized by Hawaiians over 1,000 years ago (1000 AD), with use increasing over the next few centuries. The quarry is generally considered to be located between 8,600 and 13,000 feet in elevation on the slope of Mauna Kea. The quarry area includes surface quarries, subsurface quarries, religious and ceremonial shrines, work areas, and habitation areas or shelters. The Mauna Kea quarry is considered unique among basalt quarries throughout the Hawaiian Islands and an important cultural resource.

The 2012 Ethnographic Study noted that the Pōhakuloa Chill Glass Quarry Complex “is comprised of over 500 quarry features in a 170-hectare area on the k4 lava flow” (McCoy and Orr, 2012: 27, citing Williams, 2004). They further note “The k4 flow is dated to AD 1650-1750. The largest site, Site - 21666, is about 146.5 ha and contains 388 features.” (McCoy and Orr, 2012: 27, citing Williams, 2004). The study also states that only 810 of the 4,050 hectares of the Mauna Loa flow had been surveyed. It is unclear if additional surveys of this area have been undertaken since this time.

#### **4.1.3.3 Stone Tool Manufacture**

The traditional Hawaiian ko'i, an axe or adze, was an important tool for traditional or customary practices. The ko'i was a widely utilized tool by Hawaiians, as it was used for carving, cutting, and other purposes (**Figure 14**). Hawaiians primarily made their ko'i from basalt because the hardness of the material made it suitable for cutting and carving.

Ko'i were fashioned first by identifying a suitable piece of basalt. A haku kako'i (hammerstone or other pieces of hard stone used to shape the ko'i) would then be used to begin shaping the head of the ko'i. Malo (1951: 51) wrote of the ax-makers (known as po'e kako'i).

1. The ax [adze] of the Hawaiian was of stone. The art of making it was handed down from remote ages. Ax-makers were a greatly esteemed class in Hawaii nei. Through their craft was obtained the means of felling trees and of cutting and hewing all kinds of timber used in every sort of woodwork.

Ko'i were critically important tools in the traditional Hawaiian culture. Ko'i of all sizes were regularly used through the islands. Large ko'i were used in canoe making and for felling trees, whereas Hawaiians used small ko'i as a tool to carve items for traditional cooking and habitation.



Figure 14. Ko'i (hafted adze), 1700s, Hawai'i, maker unknown. Gift of Lord St Oswald, 1912. CC BY-NC-ND 4.0. Te Papa (FE000334) <https://collections.tepapa.govt.nz/object/145329>

#### 4.1.3.4 *Uhau Humu Pohaku (Dry Stone Stacking)*

Pōhaku were of great importance to Native Hawaiians (Malo, 1951: 19). Traditionally, numerous names were used to describe rocks of different sizes and compositions. The practice of construction with stone, or stone masonry, is called uhau humu pohaku (**Figure 15**). The term references the way rocks were placed in an overlapping fashion to construct habitation structures, terrace walls, heiau, ahu or cairns.



**Figure 15. Stone platform on Pu'u Koli, located at the south end of Training Area 21, U.S. Army Garrison Pōhakuloa Training Area (2012)**

This practice has enjoyed a considerable revival in recent years. The State of Hawai'i Department of Transportation has even developed an Ahu Program Guide which outlines the "The Ahu Program." The program "is a partnership between HDOT and local communities to guide the installation process of signs and/or stone ahu markers along ahupua'a boundaries on State roads. The installation of ahu markers through this program is a voluntary community effort towards recognizing the traditional geographic boundaries of our islands" (HDOT 2012).

Archaeological evidence shows that this practice occurred within the PTA lands. Emerson (1885) describes an ahu that was likely located in State-owned land, "I have located an ahu 18 feet long, 7 feet wide, and 4 feet high on the East side of the well-known Alanui Kui leading across the ancient aa from the flow of 1859 to Puu Ka Pele and Waimea. The direction of the road, as far as visible is N. 20 E. magnetic. About 40 feet South of the ahu is the edge of the aa bank. At about 90 feet is another similar descent of say 7 or 8 feet."

This may very well have been one of the altars built by 'Umi, described in Hawaiian (translated by Maly) in the following section, as documented in the *Ke Au Okoa* newspaper in 1865.

***Heiau of the Mountain Lands Described in "Na Kaa o Kekahi Elemakule o Hawaii" (1865)***

Among the early accounts penned by Native Hawaiian writers which reference features associated with the 'āina mauna is an 1865 account, originally collected in 1853. Hawaiian language newspaper *Ke Au Okoa* published an article titled “Na Kaa o Kekahi Elemakule o Hawaii” May 8–22, 1865, taken from the stories collected by Jules Remy, a French man who came to Hawai‘i in 1851. While introducing the article, it is stated that Remy dwelt in Hawai‘i for about three years, during which time he became proficient in the Hawaiian language. Remy traveled around the islands, documenting sites and events he witnessed and recording histories that were related to him. His narratives, written in French, reached Hawai‘i and were translated into Hawaiian by W.D. Alexander (*Ke Au Okoa*, May 8, 1865).

“Na Kaa o Kekahi Elemakule Hawaii” was collected by Remy in March 1853 when he visited Ho‘opūloa, South Kona. Upon landing, Remy recorded that he was warmly greeted by the people on the shore, and among the many people gathered, he observed an elderly gentleman. He was “stout and broad-chested, and on the account of his age, his hair was reddish gray.”

Remy learned that the man was Kanuha,<sup>5</sup> a man of chiefly descent, born before the time that Alapa‘i-nui died in 1752 (*Ke Au Okoa*, May 8, 1865). Remy noted that Kanuha was nearly 116 years old and in good health. Due to his advanced age, he spoke with authority on ancient customs and the history of the Hawaiian people (*Ke Au Okoa*, May 8, 1865).

Among the traditions which Kanuha told Remy was an account of the ascent of ‘Umi to the position of king on the island of Hawai‘i. In the account, Kanuha describes the history behind the construction of the famed heiau (temple) ‘Ahu-a-‘Umi and the construction of three other heiau on the ‘āina mauna – one on Mauna Kea, one on Mauna Loa, and one on a hill near the Ka‘ohe-Waikōloa boundary. In addition to ‘Ahu-a-‘Umi, these heiau included Pu‘u Ke‘eke‘e (an area of a known pu‘u in Ka‘ohe, near Pu‘u ka Pele), Mauna Halepōhaku (on Mauna Kea), and Pōhaku o Hanalei (on Mauna Loa). By description, and in some cases, by physical features on the ground, these heiau were situated in the lands of Humu‘ula (perhaps two of the heiau), Ka‘ohe, and Keauhou.

It is noted here that in his own work Abraham Fornander acknowledged the age and authority of Kanuha, but he also found inconsistencies in the genealogical relationship of individuals mentioned by Kanuha (1973:99-101). In particular, Remy reported that Kanuha conveyed to him that ‘Umi went to war with Keli‘iokaloa, a chief of Kona. Historical accounts by native writers and Fornander record that Keli‘iokaloa was the son of ‘Umi and that he became king of Kona for a time following his father’s death (Fornander, 1973:99-101). It should be considered here that this historical inconsistency may actually be attributed to Remy’s own hand, rather than the narratives of Kanuha.

Regardless of the possible genealogical differences, one of the unique qualities of the account is that it provides otherwise unrecorded documentation regarding the construction and occurrence of heiau in the high mountainous region of Hawai‘i. The following narratives, with excerpts of the original Hawaiian and translations of the accounts (translated by Maly), are taken from Remy’s recording of Kanuha’s story (Maly 2005: 26-29).

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<sup>5</sup> Kanuha is found in several historical accounts recorded by Kamakau (1961) and Fornander (1973).

***Ke Au Okoa*****Na Kaa o Kekahi Elemakule o Hawaii.****May 22, 1865**

Umi ruled in place of Hakau, and his friends Koi and Omaokamau dwelt with him. Piimaiwaa, Umi's war leader dwelt in Hilo. With Umi, there was also his trusted companion Pakaa, and his priest Lono. At this time, Umi ruled the eastern side of Hawaii, while on the western side, his relative Keliokaloa, ruled and dwelt at Kailua... In the time that he dwelt in Kailua, Keliokaloa was known as an evil chief, he cut down the coconut trees and desecrated the cultivated fields. It was because of these evil deeds that Umi made preparations to go to war against him. Umi marched to battle, joined by his famous warrior, Piimaiwaa, and his companions Koi and Omaokamau. Also with him were his favorite, Pakaa, and his priest Lono.

The Hawaiian narrative then reads:

***Ke Au Okoa*****Na Kaa o Kekahi Elemakule o Hawaii.****Mei 22, 1865**

Mawaena o **Maunakea** a me Hualalai ka hele pualu ana o ua alii nei me kona manao e iho ae i Kailua. Aole nae i kali o Keliokaloa, aka, ua pii nui aku oia me kona poe koa e houka aku ia Umi. Ua halawai na puulu kaa a i elua maluna o kekahi wahi papu i hoopuni ia e na mauna ekolu, a i kapaia hoi ke Ahu a Umi. Kaa mai o Laepuni ma (he mau kanaka makaainana pili alii ole) ia Umi, a aneane e make o Umi ia laua, lele mai o Piimaiwaa e kokua iaia, a oia ka mea nana i hooholo ae ka lanakila ma ko Umi aoao. Aohe mau mea nui i hai ia mai, aka, me he mea la, ua make ke alii o Kailua iloko oia kaa ana. Ma keia kaa ana, ua lilo holookoa ia Umi ke Aupuni, a lilo iho oia ke alii ai moku o ka mokupuni o Hawaii. I mea e ili aku ai ka hoomanao ana no ia kaa ua hanauna aku a ia hanauna aku, ua kukulu ae la ia i ke ahua, e o ia nei a hiki i keia wa ke ahua a Umi...

**May 22, 1865**

Between **Mauna Kea** and Hualalai the chief and all his party traveled, with the thought of descending to Kailua. Keliokaloa did not wait though, but instead, traveled with his warriors to meet Umi in battle. The two armies met on a broad open plain, surrounded by the three mountains, at the place [now] called Ahu a Umi. There, Laepuni and them (people who were unattached to a chief) fought with Umi. Umi was almost killed, but Piimaiwaa leapt in and helped him, it was he who turned the battle in the favor of Umi's side. There is not much else that is said, but, it is known that the chief of Kailua died in the battle. Thus, with this battle, the entire kingdom was gained by Umi. He became the chief that controlled the entire island of Hawaii. *So that the battle would be remembered from generation to generation, he [Umi] built the stone altar, that remains to this day, the altar [ahua] of Umi...*

The narrative records that early in 'Umi's life, the priests Nunu and Wawa had discerned 'Umi's nature, and foretold that his god Kā'ili, made with a feather from the god Halulu, had empowered him. Indeed, 'Umi was a religious chief and made many temples for his god. Among the temples were:

***Ke Au Okoa***

**Na Kaa o Kekahi Elemakule o Hawaii.**

**Mei 22, 1865**

...Ua kukulu no hoi ia he heiau malalo o Pohaku Hanalei, a ua kapaia o ke ahua o Hanalei; a ma na aoao o Maunakea e hele ala i Hilo, ua kukulu no ia i ke kolu a ka heiau, ma kahi i kapa ia o Puukekee<sup>6</sup>; a ma Mauna Halepohaku malaila ia i kukulu ai i ka ha o na heiau, a malaila no hoi i olelo ia ai ua noho o Umi malaila me kona mau kanaka. Ua olelo ia o Umi he alii noho mauna, no kona aloha i kona poe kanaka, nolaila, ua hoi aku ia i waenakonu o ka mokupuni ilaila kona wahi i noho ai me kona poe kanaka, a na kona makaainana e noho ana ma na kapakai, e lawe mai i ka ai na lakou, mai kela pea, keia pea...

**May 22, 1865**

...He [Umi] also built a heiau below Pohaku Hanalei, it is called the ahua o Hanalei [altar of Hanalei]; and on the side Mauna Kea, by where one travels to Hilo, he built the third of his temples, at the place called Puukekee [also written Puu Keekee in historical texts]; and there at Mauna Halepohaku he built the fourth of his temples; there it is said, Umi dwelt with his many people. It is said that Umi was a chief who dwelt upon the mountain, it was because of his love of his people, that he [Umi] returned and dwelt in the middle of the island [Ahu-a-Umi], that is where he dwelt with his beloved people. His commoners lived along the shores, and they brought food for them [in the uplands], from one side of the island to the other...

**4.1.3.5 *Parietal Art (Petroglyphs and Petrographs)***

McCoy and Orr (2012) identify the prevalence of petroglyphs and petrographs (also pictographs) throughout the Hawai'i Islands.

Hawaiians made the following types of rock art: pecked, grooved, and bas-relief petroglyphs, and painted pictographs. Pecking, however, was the predominant technique employed (citing Lee 2001:589). Common motifs include anthropomorphic figures and geometric elements, such as cupules (referred to as piko, or umbilical cord holes). The human figures tended to change in form over time from stick figures (similar to those found in the Marquesas Islands) to triangular-

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<sup>6</sup> Puukekee (Pu'u Kēke'e or Pu'u Ke'eke'e) is a hill that sits on the boundary between Waikōloa, Kohala, and Ka'ohe, Hāmākua.

torso figures, and then to more muscled forms. Other less common motifs are footprints, canoe sails (not attached to canoes), and ceremonial regalia. Images of animals like fish, turtles, and sea mammals, are very rare (citing Lee 2001:590). Cox and Stasack (1970:63) noted a surprising lack of interest in nature or natural forms generally (e.g., so few animals and vegetation) on the part of Hawaiians. They further noticed that houses, clothed figures, water, fire, volcanic activity, and geographical features were also conspicuously absent.

For the most part, archaeologists have largely ignored Hawaiian rock art (citing Lee 2002:79). In 1924, Kenneth Emory (1924) conducted one of the first attempts to study Hawaiian rock art. Unfortunately, he came to feel that petroglyphs were not very important, setting the tone for subsequent “dismissive” attitudes towards rock art in the decades to follow (citing Lee 2001:590). It was not until the 1970s, with Cox and Stasack’s (1970) *Hawaiian Petroglyphs*, did anyone undertake serious investigations into Hawaiian petroglyphs (following this, see Lee and Stasack 1999).

Hawai‘i Island has an abundance of petroglyph sites compared to the other major Hawaiian Islands (citing Lee 2002:79). In fact, Hawai‘i Island has the largest numbers, densest concentrations, and greatest variety of forms and styles in the Islands; consequently, most petroglyph research has been focused on Hawai‘i Island sites (citing Cox and Stasack 1970:51). Petroglyphs on Hawai‘i Island are most commonly found on pahoehoe flows and inside lava tube caves (citing Lee 2001:589). For example, the Ka‘u region is where most lava tube petroglyphs are found (citing Cox and Stasack 1970:13).

McCoy and Orr identify Site 50-10-31-21303 as having recorded petroglyphs. According to the 2018 PA, Site -21303 is an unevaluated lava tube of unknown function located in Training Area 21.

#### **4.1.3.6 Trails**

Langlas et al. found: “Caves and trails dominate the archaeological sites in the PTA” (1999: 17). It was also established in the 2012 Ethnographic Study that trails played an important role in the distribution of quarried materials in the region, allowing for communities from around the island to utilize and benefit from this natural and cultural resource (McCoy and Orr, 2012: 28).

One trail that ran through State-owned land is Alanui Kui, which was part of the Alanui ‘Aupuni trail system. Mills (2002) provides a more detailed history of the extensive trail system that ran throughout all Hawai‘i Island.

Travel across the ‘āina mauna is documented in native traditions, which describe ala hele (trails) passing from the coastal lowlands through the forest lands, along the edge of the forests, across the plateau lands of the Pōhakuloa-Ka‘ohe region, and to the summit of Mauna Kea. These ala hele approached Mauna Kea from Hilo, Hāmākua, Kohala, Kona, and Ka‘ū, five of the major districts on the island. Only Puna, which is cut off from direct access to the mountain lands, apparently did not have a direct trail to the ‘āina mauna. Thus, people traveling to Mauna Kea from Puna traveled through the lands of Waiākea, Hilo or Keauhou, Ka‘ū to reach Humu‘ula and the slopes of Mauna Kea.

In the early 1860s, Hawaiian historian Samuel Mānaiakalani Kamakau provided several early Hawaiian historical accounts of the ‘āina mauna. In Kamakau’s description of the rise of ‘Umi to

power, we learn of his conquest of Hilo and the route traveled from Waipi'o, Hāmākua, crossed Mauna Kea via the trail that ran across Humu'ula-Pi'ihonua and through Kaūmana, to the royal community on Hilo Bay:

It was decided to make war on the chiefs of Hilo and to go without delay by way of Mauna Kea. From back of Ka'umana they were to descent to Hilo. It was shorter to go by way of the mountain to *the trail of Poli'ahu and Poli'ahu's spring [Waiiau]* at the top of Mauna Kea, and then down toward Hilo. It was an ancient trail used by those of Hamakua, Kohala, and Waimea to go to Hilo. They made ready to go with their fighting parties to Mauna Kea, descended back of Hilo, and encamped just above the stream of Wai-anuenue... (Kamakau, 1961:16-17)

By the early 1820s, foreign visitors, in the company of native guides, began making trips across the 'āina mauna and to the summit of Mauna Kea. Based on their accounts, travel in the region through the middle 1800s followed the old trails or cut across new areas where dense forest growth and new lava flows covered older routes. By the 1850s, the Kingdom of Hawai'i entered into a program of improving ancient trails and identifying new routes, by which to improve travel between various locations and facilitate commerce. The earliest recorded improvements, describing work government on a trail around Mauna Kea, document work on the Waimea-Kula'imano trail (cutting across the lands of Ka'ohe, Hāmākua and Hilo). The route ran above the forest line and to the coast of Hilo, and in 1854 was improved to accommodate wagon travel.

In the latter 1850s, as leases were given out for the lands of Humu'ula and Ka'ohe, and the sheep and bullock hunting interests grew, the 1854 route was maintained and the upper trail between Kula'imano-Makahalanaloa was improved to the Kalai'eha vicinity. In 1862, the Kingdom again initiated a program to improve the government roads across the 'āina mauna. Two routes were proposed, one between Hilo and Waimea via Kalai'eha, and the second to improve on the trail from Kalai'eha towards Kula'imano-Makahalanaloa, and around through Hanaipoe-Mānā and Waimea. These trails, termed Alanui Aupuni, were appropriated and work was completed by the late 1860s. The routes appear on island maps through 1901 with subsequent designations as trails on later maps.

By the early 1870s, the ancient trail between Kalai'eha and the summit of Mauna Kea was improved into a horse trail by the Spencers, lessees of the Mauna Kea mountain lands. Other routes, accessing outlying ranching stations, such as at Pu'u 'Ō'ō and Puaka (Pua'ākala), Lahohinu, and Hānaipoe had also been improved by lessees, with routes running around the mountain and down to Hilo, or out to Waimea. In the leases of the Crown Lands and Government Lands, it was specified that improvements, including trails, reverted to the Crown or Government upon termination of the leases. Until the late 1940s and early 1950s, these trails and government roads were primarily used by lessees for transportation of goods and cared for by the lessees. There are also numerous accounts by visitors to the 'āina mauna documenting travel in the region. By the late 1890s, the Kohala road supervisor reported that while the mountain roads belonged to the Government, they were all but private by the nature of their use.

Little work was done on the Kalai'eha-Hilo section of the road (trails) after the 1870s. The trail was accessed by ranchers, with routes diverging to Kalai'eha and Pu'u 'Ō'ō, as described in survey records, journals, and kama'āina testimonies. It was also periodically used by visitors to the mountain lands, usually those who were traveling to view Mauna Loa lava flows or to make the ascent of Mauna Kea. It was not until 1942 that the route was modified as a vehicular road to what became the Saddle Road, following in areas the native trail and historic route, and cutting across new lands in other areas. The

“Saddle Road” was formally turned over to the Territory in 1947, after which the general public was given an opportunity to travel to the mountain lands unhindered.

Between the 1930s and 1940s, improvements were made to the Kalai’eha-Waipunalei section of the road to Waimea as a part of the Civilian Conservation Corps (CCC) and Territorial Forestry programs, with work also being done by the Parker Ranch. Likewise, the Kalai’eha-Waiki’i route was maintained by the ranch and improved by the United States Army in 1942.

In 1963, interest in Mauna Kea emerged as a site for a telescope. Hawai’i-based scientists Walter Stieger (with the University of Hawai’i) and Howard Ellis (with the National Weather Service’s Mauna Loa Weather Station) facilitated trips by Dr. Gerard Kuper and Alike Herring (both associated with the University of Arizona and NASA) to the summits of Mauna Loa and Mauna Kea. The Mauna Kea route basically followed the old foot trail from Kalai’eha, past Kalepeamo, Keonehe’ehe’e, and up to the summit. Over the years, the old trail was modified for horses and pack animals, and after World War II, for the occasional four-wheel drive vehicles that ascended the mountain. In 1964, Pu’u Poli’ahu on Mauna Kea had been chosen as the site for the first telescope, and State funds were released for grading a road to Pu’u Poli’ahu, to facilitate construction and access by the scientists. Since 1964, the primary route of access up the mountain slopes has remained generally the same, although new accesses and realignments of the earlier route were made as additional development in the summit region occurred.

## 4.2 Archival History

The history of the project area and the broad geographical area provides important details on the evolution, change, or disappearance of cultural resources, practices, and beliefs over time. An overview of three main historical eras is presented in the following three sections.

### 4.2.1 Traditional Historical Context

The historic records of Native Hawaiian writers share that Mauna Kea and Mauna Loa were storied peaks, as were the surrounding ‘āina mauna, or mountain lands. The natural resources and mountains were believed to be manifestations of various creative forces of nature and were revered by Native Hawaiians.

In pre-Western contact Hawai’i, all land and natural resources were held in trust by the high chiefs (ali’i ‘ai ahupua’a or ali’i ‘ai moku). The use of lands and resources were given to the hoa’āina (native tenants), under the governance of the ali’i and their representatives or land agents (Konohiki), who were generally lesser chiefs as well.

The land of Humu’ula – extending from sea level to the 9,000-foot elevation on Mauna Kea, and above the 13,000-foot elevation on Mauna Loa – is apparently named for a type of stone (Red jasper stone) that was used in making ko’i (adze). The place name of Ka’ohe – a land area extending from sea level to the summits of Mauna Kea and Mauna Loa – may be literally translated as “The-bamboo” or named for a type of kalo (taro) that may have been common in the region (cf. Pukui et al., 1974).

Native Hawaiian traditions and historical accounts describe the lands of Humu’ula and Ka’ohe – those areas extending from shore to around the 6,000 foot elevation – as having once been covered with dense forests, and frequented by native practitioners who gathered forest-plant resources, birds, and food. These lands, which comprise the larger ‘āina mauna, were frequented by individuals who were

traveling to the upper regions of Mauna Kea to worship, gather stone, bury family members, or deposit the piko (umbilical cords of new-born children) in sacred and safe areas; and by those who were crossing from one region of the island to another.

Traditions and historical records show that the deification and personification of the land and natural resources, and the practices of district subdividing and land use as described above, were integral to Hawaiian life, and were the product of strictly adhered to resource management planning. In this system, the people learned to live within the wealth and limitations of their natural environment, and were able to sustain themselves on the land and ocean. It is in this cultural system that illustrates the significance of the lands of Ka'ohē, Humu'ula and the neighboring 'āina mauna.

#### **4.2.2 Post-Contact and Kingdom History**

In 1848, the Hawaiian system of land tenure was radically altered by the Māhele 'Āina (Division of Lands). This change in land tenure was promoted by the missionaries, the growing Western population, and business interests in the island kingdom (Maly 2005: 266).

The Māhele 'Āina defined the land interests of Kamehameha III (the King), the high-ranking chiefs, and the Konohiki. As a result of the Māhele, all land in the Kingdom of Hawai'i came to be placed in one of three categories: Crown Lands (for the occupants of the throne); Government Lands (to support public works and government programs); and Konohiki Lands (for the chiefs associated with the Kamehameha lineage and rise to power).

Subsequently, the ho'āina were granted the right to claim parcels of land for their personal use from lands situated in the three categories of land listed above. The "Enabling" or "Kuleana Act" laid out the framework by which native tenants could apply for, and be granted fee-simple interest in "Kuleana" lands, and confirmed their rights to access to, and collection of resources necessary to their life upon the land in their given ahupua'a.

The lands awarded to the ho'āina became known as "Kuleana Lands." All of the claims and awards (L.C.A.) were numbered, and the L.C.A. numbers remain in use today to identify the original owners of lands in Hawai'i.

Following the Māhele 'Āina of 1848, which established a system of fee-simple property rights in Hawai'i, individual ali'i and the Government began entering into leasehold agreements with parties for vast tracts of land throughout the islands. These large tracts of land were more readily available to lessees who sought to develop a wide range of business interests (Maly 2005: 371).

Early leases in the area date back to 1857 (Keoni Ana to F. Spencer), and the operations of Francis Spencer's Waimea Grazing and Agricultural Company. The lease took in all of the mountain lands, to the summit of Mauna Kea, across Ka'ohē to its Mauna Loa boundary. Activities were all tied to sheep and cattle ranching. Subsequently, in 1870, the lease was acquired by Parker Ranch, which held most of the Ka'ohē mountain lands until their removal from the lease in 1905 for the Mauna Kea Forest Reserve.

### 4.2.3 Agricultural and Subsistence History

As described in the historical journals and communications cited in this study, by the 1820s, populations of wild cattle (bullocks), sheep, goats, pigs, and dogs increased to a point where they were causing impacts to the landscape, and at times, even harassing travelers. Between the 1830s and 1850s, the Kingdom established a program, which it managed through local agents, for taking wild cattle, sheep, and other stock from the mountain lands as needed for hides, tallow, and meat, or in payment for services rendered.

Land use records from Kingdom and Government collections for the lands of Humu'ula and Ka'ohe (project area), and the neighboring 'āina mauna (the broad geographical area) date back to at least the 1840s. Early communications describe the taking of wild cattle, sheep, goats, and pigs from the region, through rights granted by, or on behalf of, the King. By the 1850s, formal leases of the Crown and Government land holdings were granted to ranchers on the mountain lands – while plantation interests were granted leases, and in some instances, fee-simple interests on the lowlands.

Ranching emerged in the islands with the introduction of cattle. Seen for its potential to create new exports and influence the local economy, ranching would grow over the decades to become a significant cultural influence in Hawai'i and on Hawai'i Island in particular. Ranching in Hawai'i traces its origins to Hawai'i Island, specifically the late 18<sup>th</sup> century when cattle and sheep were first gifted to Kamehameha I (Desilets et al., 2017: 9). The cattle grew sharply in numbers, and soon large numbers of cattle were roaming wild throughout that Hawaiian Islands (Harrington, 2019). Over the next two centuries, the culture and commerce around ranching would increase significantly (**Figure 17**).

To manage the growing population of cattle, Kamehameha brought the vaqueros from Mexico, who had the expertise to manage the cattle with horses. Hawaiians could not initially pronounce the term vaqueros, so they would attempt to use the term “españoles” (Spanish speaking males) instead. Unable to pronounce this term properly, the term “paniolo” was created.

The paniolo were regarded with great esteem. While they were not intended to remain in the islands, soon marriages between the paniolo and the local population resulted in Hawaiian paniolo (**Figure 17**). The paniolo are a distinct cultural group, or folk society, comprised of numerous ethnicities including Mexicans, Hawaiians, Portuguese, and others (Mills et. al, 2013). Records show that ranching and the paniolo utilized the project area and broad geographical area significantly before the lands were acquired by the Army.

Ranching still occurs in the adjacent lands, although no ranching activities currently take place within the project area.



**Figure 16. Cattle ranching at Parker Ranch (Hawai'i Island). Hawai'i State Archives, Paniolo Collection, PP-13-6-006 (ca. 1930)**



**Figure 17. “Typical Hawaiian Cowboys” – Hawai‘i State Archives, Paniolo Collection, PP-13-6-015 (n.d.)**

#### **4.2.4 Military History**

Tensions between the Kingdom and foreigners grew in the late nineteenth century. It is noted that “from 1826 until 1893, the United States recognized the independence of the Kingdom of Hawaii, extended full and complete diplomatic recognition to the Hawaiian Government, and entered into treaties and conventions with the Hawaiian monarchs to govern commerce and navigation in 1826, 1842, 1849, 1875, and 1887” (Pub. Law No. 103-150, 1993). The friendly relationship that had existed between the United States and the Kingdom of Hawai‘i would end abruptly on January 14, 1893, when United States Minister John L. Stevens, assigned to the sovereign and independent Kingdom of Hawai‘i, conspired with a small group of non-Hawaiian residents of the Kingdom of Hawai‘i, including citizens of the United States, to overthrow the indigenous, lawful, and sovereign Government of Hawai‘i.

In furtherance of the conspiracy to overthrow the Government of Hawai‘i, the United States Minister and naval representatives had armed naval forces invade the sovereign Hawaiian nation on January 16, 1893 and position themselves near the Hawaiian Government buildings and ‘Iolani Palace to intimidate Queen Lili‘uokalani and her Government (Pub. Law No. 103-150, 1993). Then on January 17, 1893, a Committee of Safety that represented the American and European sugar planters, descendants of missionaries, and financiers led a coup d’état against the Hawaiian monarchy, causing Queen Lili‘uokalani to yield her authority out of concern for her people. This committee then proclaimed the establishment of a Provisional Government.

One of the results of this coup d’état was the seizure and continued State control over “ceded lands.” Ceded lands are those that were controlled by the Kingdom of Hawai‘i as “Government or Crown lands” (Van Dyke, 2008), when Queen Lili‘uokalani yielded her authority to the United States in 1893. The self-proclaimed “Provisional Government” installed itself into power until 1894. The successor government, the Republic of Hawai‘i, ceded these lands, defined as “all public, Government or Crown lands, public buildings or edifices, ports, harbors, military equipment, and all other public property of every kind” (Van Dyke, 2008), to the United States under the 1898 Joint Resolution of Annexation (30 Stat. 750), by which the United States accepted the absolute fee and ownership of the ceded lands.

While the acceptance of fee and ownership of the ceded lands would have long-standing political impacts, this transfer did not have immediate impacts on most on-going land uses that occurred at the end of the nineteenth century. Despite the upheaval in Honolulu, the leases and ranching activities across the ‘āina mauna remained unchanged until the twentieth century when an increased need for U.S. military activities in the islands emerged.

The broad geographical area was first used for U.S. military training during World War II by U.S. Marine Corps as an artillery live-fire training area. After the end of WWII, control of the area was transferred to the Hawaii Territorial Guard. In 1956, territorial Governor Samuel Wilder King signed Executive Order No. 17192 for approximately 758 acres at PTA for “. . . uses and purposes of the United States of America, to be under the control and management of the Department of the Army.” King was the son of James A. King, who assisted in the 1893 coup d’état against the Kingdom of Hawai‘i and its sovereign Queen Lili‘uokalani. The elder King subsequently became the minister of the interior for the self-proclaimed Provisional Government of Hawai‘i. The 758 acres signed over by Governor King encompasses the Cantonment and Bradshaw Army Airfield.

In 1956, PTA was permanently established as a training site through a formal Maneuver Agreement between the Territory of Hawai‘i and the United States. The Maneuver Agreement granted exclusive use of 99,200 acres to the U.S. Government to conduct training. In 1964, President Lyndon B. Johnson issued Executive Order No. 111673 and authorized 84,057 acres of the 99,200-acre training area for fee simple (i.e., owned completely without any limitations or conditions) use of the United States. This 84,057-acre area encompasses the U.S. Government-controlled land south of the State-leased land, including the impact area.

### **4.3 Previous Ethnographic Studies**

Use of previous studies for this report included 1) studies previously commissioned and approved for use by USAG-HI, and 2) publicly available ethnographic studies of the project area and broad geographical area.

### 4.3.1 Langlas et al. (1999)

*Charles Langlas, Thomas R. Wolforth, and James Head. Archaeological, Historical, and Traditional Cultural Property Assessment for the Hawai'i Defense Access Road A-AD-6(1) and Saddle Road (SR 200) Project, Paul H. Rosendahl, Ph.D., Inc., April 1999.*

In 1999, Paul Rosendahl supervised an archaeological and traditional cultural property inventory survey for the Hawaii Defense Access Road A-AD-6(1) and Saddle Road (SR 200). Nineteen sites were recorded during that survey, excluding 35 modern military sites that were evaluated as not significant. Three of these sites occur on State-owned land. The study was commissioned by the U.S. Federal Highways Administration.

The survey included a historical and ethnographic study. The purpose of this study was to a) identify Native Hawaiian cultural sites or other historic sites, which might be affected by the project, b) describe the Native Hawaiian cultural or historical context of those sites, c) evaluate the Hawaiian cultural or historic significance of the sites to determine whether they are eligible for listing on the NRHP, and d) assess the effects of the project on significant sites and recommend mitigation to any adverse effects (Langlas et al. , 1999).

#### 4.3.1.1 Ritual Sites Previously Identified by Henry Auwae

Interviews conducted with Henry Auwae in 1996 identified the likely presence of “Native Hawaiian burials and ritual sites within the project area” (Langlas et al., 1999: 7). The study also noted “ritual sites would generally be considered ‘traditional cultural properties,’ as described in National Register Bulletin 38” (Langlas et al., 1999: 7). In their section on Traditional and Hawaiian Cultural Sites, they noted:

All of the information on the sites comes from "Papa" Henry Auwae. He believes he is the only individual alive today who still has knowledge of either the burials or the ritual sites, and that appears to be the case. A considerable attempt was made to locate additional informants with knowledge of Native Hawaiian sites in the project area, without success. Older Hawaiians in Waimea (Sonny Kaniho, Johnny Lindsey) and Hilo (Genesis Lee Loy, Pua Kanahale) and Native Hawaiian Organizations in both areas were asked if they knew of any kūpuna who might have such knowledge, but they could not suggest anyone. In this century, the Hawaiians familiar with the project area would mainly have been the Hawaiian cowboys who worked for Parker Ranch at Ke'āmuku, Waiki'i, and Humu'ula, and for Shipman at Pu'u 'Ō'ō Ranch. Men like Willie Kaniho, who lived at Humu'ula, and David Kaiawe, who worked Pu'u 'Ō'ō Ranch, may have gained knowledge of traditional sites. But if so, that knowledge did not pass down to Willie's son Sonny Kaniho (Int. 1) or to David's nephew John Kaiawe (pers. comm.). It is not difficult to understand why Henry Auwae's knowledge of these sites is unique. Early in this century when he was a boy, he journeyed several times through the Saddle together with his great-grandparents. They both had specialist knowledge of ritual sites, and they pointed those sites out to him as they traveled. His great-grandmother was an expert healer (kahuna lā'au lapa'au) and his great-grandfather was a prophet (kalua), who came from a line of prophets. Mr. Auwae has not revisited the sites since that time (1999: 134).

Through his interviews, Henry Auwae (also known throughout the Hawaiian community as “Papa” Auwae) identified several ritual sites in that study's project area.

<b>Ritual Sites, Burials and Homesteads</b>	<b>General Description</b>
Papa Hemolele	Described as a flat area mauka of the old trail from Waimea to Humu'ula, south of Waiki'i Gulch. It was identified as a part of rest and prayer. Three stone ahu were said to be associated with this ritual site. It is likely within PTA but outside the State-owned land.
'Āina Kao	Identified as a ritual site in Pi'ihonua, near the southwest corner of Pu'u 'Ō'ō Ranch. An aerial survey conducted for the 1999 study confirmed it was covered by the 1935 lava flow.
Pu'u Kamokumoku (also known as Pu'u Kala'i'ehā)	Identified as a place where powerful kālua (prophets) lived.
Burials and Homesteads 1	Papa Auwae identified two areas that were used for habitation and/or burial sites. He recalled visiting people who lived near the Ke'āmuku Sheep Station as a child with his great-grandmother, specifically a Kahaealii family. He noted numerous Hawaiian graves in the area.
Burials and Homesteads 2	In addition to the site above, Papa Auwae identified villages in the Saddle area, on the lower slopes of Mauna Kea. He also noted that several springs were also at that elevation. He personally knew of Hawaiian burials in that area. He also specifically noted the locations of Hawaiian burials in the Bradshaw Field at PTA. He believed that these areas were heavily bulldozed by the Army and destroyed by these actions.

The Langlas et al. study specifically found:

Four of the ritual sites discussed above are potentially eligible for the National Register of Historic Sites as traditional cultural properties; the other two are not. 'Āina Kao is gone, covered by the lava. The Pu'u Kamokumoku area is too diffuse to be easily considered a traditional cultural property, and Mr. Auwae did not want that sort of status for it. Of the four-remaining sites, 'Āina Kahukahu, 'Āina 'Ākau, 'Āina Hānau and Papa Hemolele, none is presently being used by Hawaiian religious practitioners. In general, however, Hawaiians believe that heiau and other ritual sites still have mana (religious power) because of their previous use. In Western terms, they are still sacred sites (1999: 141).

#### **4.3.2 Maly (1999)**

*Kepā Maly. Mauna Kea Science Reserve and Hale Pōhaku Complex Development Plan Update: Oral History and Consultation Study, and Archival Literature Research, Kumu Pono Associates LLC, February 1, 1999.*

Portions of this 1999 study were utilized for this assessment.

### 4.3.3 Maly and Maly (2002)

Kepā Maly and Onaona Maly. *He Wahi Mo'olelo No Ka'ina A Me Nā 'Ohana O Waiki'i Ma Waikōloa (Kalana O Waimea, Kohala), A Me Ka'ina Mauna: A Collection of Traditions and Historical Accounts of the Lands and Families of Waiki'i at Waikōloa (Waimea Region, South Kohala), and the Mountain Lands, Island of Hawai'i (TMK Overview Sheet 6-7-01)*, Kumu Pono Associates LLC, 2002.

Portions of this 2002 study were utilized for this assessment.

### 4.3.4 Maly (2005)

Kepā Maly, *A Collection of Native Traditions, Historical Accounts, and Oral History Interviews for: Mauna Kea, the Lands of Ka'ohe, Humu'ula and the 'Āina Mauna on the Island of Hawai'i*, Kumu Pono Associates LLC, March 30, 2005.

Portions of this 2005 study— particularly the background research—were utilized for this assessment with permission from Maly.

### 4.3.5 McCoy and Orr (2012)

Patrick McCoy and Maria Orr. Final Report: *Ethnographic Study of Pōhakuloa Training Area and Central Hāmākua District, Island of Hawai'i, State of Hawai'i*. Prepared for Dawson Group Inc. November 2012.

This was the only study commissioned by the Army that attempted to identify properties at PTA that may be eligible for the National Register because of traditional religious or cultural significance. These sites are often referred to as "traditional cultural properties" or "TCPs". The report provides a figure defining the project area and place names (**Table 11**).

Table 11. Place Names from 2012 McCoy and Orr Ethnographic Study <sup>7</sup>
Kohala
Waimea
Māmalahoa Hwy
Kawaihae
Waikōloa
Queen Ka‘ahumanu Highway
Hualālai
Keāmuku
Waiki‘i
Papa Hemolele
Mauna Kea
Humu‘ula
Mauna Kea State Park
Humu‘ula Saddle
Humu‘ula Sheep Station
Saddle Road
‘Āina Kao
‘Āina Hanau
‘Āina Akau
‘Āina Kahukahu
Ponahawai
Hilo
Ahu a ‘Umi Heiau
Mauna Loa

A summary of the findings of this study is provided in **Table 12**.

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<sup>7</sup> The spelling of the place names in **Table 11** was referenced from McCoy and Orr’s 2012 study.

<b>Traditional or Contemporary Practice</b>	<b>TCP Determination</b>
Quarrying and Stone Tool Manufacture	Properties associated with practice not considered eligible for consideration as TCPs (McCoy and Orr 2012: 10)
Bird Hunting	Past associations with bird hunting do not provide adequate justification of associated locations as TCPs (McCoy and Orr 2012: 11)
Human Burial Practices	“Although human burial practices apparently have occurred within the boundaries of PTA, there is no indication that it was a common practice in the area. Further, modern human burials have not occurred within PTA during present times, and no active community traditions relating to burials at PTA have been identified. For these reasons, the possibility of pre-Contact burial practices is examined for in any area of PTA being considered eligible for consideration as a TCP” (McCoy and Orr 2012: 12)
Ceremonial and Ritual Practices and Religious Beliefs	Do not appear to qualify for consideration as TCPs
Journeying (Huaka’i)	“There does not appear to be sufficient reason to consider areas within PTA used during <i>hauka’i</i> (sic) as eligible for consideration as TCPs” (McCoy and Orr 2012: 15)
Hunting of Feral Ungulates	Not warranted to consider properties within PTA as potential TCPs
Scattering of Cremation Remains	Practice not known to have occurred prior to 50 years ago and individually are not significant events in the broad pattern of history
Ranching Activities	Not eligible for consideration as TCPs

The study concludes:

The focus of this ethnographic analysis was to evaluate whether any portions of PTA would qualify for nomination as TCPs under NRHP. The results of the analysis indicate that traditional Native Hawaiian cultural practices, as well as contemporary cultural practices, did occur within the boundaries of PTA in the past. However, none of the areas within PTA appear to qualify for consideration as TCPs under established National Park Service (NPS) criteria used to determine eligibility for listing in the NRHP (McCoy and Orr 2012: 5-6).

This is the only identified ethnographic or traditional cultural property study commissioned by the Army for study and/or assessment of traditional cultural properties (TCPs) within PTA.

## 5.0 Online Survey and Interviews

### 5.1.1 Survey Responses

As described in **Section 2.2.1**, an online survey was initiated in an attempt to reach a broad section of the public and to collect preliminary information for the study. The survey was first created in September 2020 and made publicly available starting October 1, 2020, with the public notice in the October 2020 *Ka Wai Ola*. The survey remained open and available for any member of the public through December 31, 2022, at which time it was closed. There were 62 total responses prior to the completion and publication of the DEIS, with a 39 percent completion rate.

A republication of the public notice was placed in the *Ka Wai Ola* in December 2022. Another ad was taken out on social media (Facebook and Instagram) for the entire island of Hawai'i Island. The number of responses rose from 62 to 240. The total number of responses was 240, with a 63 percent completion rate.

One respondent asked to have their responses disregarded from the CIA. The low completion rate was likely due to individuals looking to see the questions of the survey but not complete the survey. The completed responses are provided in their entirety in **Appendix B** with the exception of any surveys where no responses were provided or those that asked to be redacted.

Respondents to the survey expressed knowledge of cultural resources, practices, and beliefs within the area and noted the following as being pertinent to the project area. These are summarized below.

*Mo'olelo* referenced by survey respondents for the project area include mo'olelo of Umi-a-Līloa (associated with a heiau) and Pele. A survey respondent shared that Kamalalawalu and Lanukaula battled in the area in the story of Lonoikamakahiki. The same survey respondent also shared that the broad geographical area is specifically mentioned as a place Hi'iakaikapoliopole first traveled after she fled Pele.

*Ceremonial practices* mentioned by survey respondents include the practice of celebrating Makahiki; caring for burial sites of iwi kūpuna in the project area; and visiting heiau.

*Mālama 'āina* is also apparent in respondents' mentions of intangible cultural resources of importance in the project area and the broad geographical area. This includes caring for resources such as traditionally important plants and the land itself as a significant cultural resource that is managed and cared for.

*Subsistence practices* such as pig hunting were mentioned by survey respondents. In general, respondents shared that hunting served as a means to feed their families, communities, and engage with their environment. Some respondents noted that hunting was also a means to connect with cultural values.

*Traditional gathering practices* of important plants were referenced by respondents.

Celebrations of Makahiki and hunting occur on the State-owned land. It is unclear how many of the other cultural practices and beliefs have occurred and/or are occurring within the State-owned land versus the broad geographical area around the project area. None of the survey respondents clarified

specific locations where these practices and resources occur and are located, and survey respondents were not contacted to provide clarifying information.

### 5.1.2 Interview Responses

One-on-one interviews were conducted with four individuals associated with the PTA project area. After the interview, a summary of the discussion was sent to the interviewee to review, and the finalized summary, as approved by the interviewee, is in Appendix C. The current section lists the cultural resources, practices, and beliefs each interviewee mentioned that pertained to the State-owned land and the broad geographical area. For a list of effects to cultural resources, practices, and beliefs from continued military activity in the PTA project area as identified by interviewees, see **Section 6.3**. For a list of the interviewees' mitigation recommendations for the PTA project area, see **Section 9.2**. Biographical information for each interviewee is provided in **Appendix C**.

#### 5.1.2.1 Mr. Kamana Kapele

The interview with Mr. Kamana Kapele was conducted by Ms. Trisha Watson from Honua Consulting, LLC, on September 12, 2021. Mr. Kapele shared the following information on cultural resources, practices, and beliefs:

##### Cultural Resources

- Mr. Kapele noted that Pu'u Kapele, the ki'i, and the shrine are all cultural resources. He noted that Pu'u Kapele is fenced off due to the endangered species of plants found in the habitat, specifically honohono (an endemic mint), which is also a cultural resource.

##### Cultural Practices and Beliefs

- Mr. Kapele noted that his family makes regular visits to the site for spiritual and religious practices. He noted that his traditional and customary association with the project area is centered on Pu'u Kapele. However, he also noted that Native Hawaiian traditional and customary beliefs suggest that there is connectivity between sacred spaces, and that other prominent pu'u in the area, including Pu'u Ke'eke'e, are also culturally significant.

#### 5.1.2.2 Dr. Kū Kahakalau

The interview with Dr. Kū Kahakalau was conducted by Mr. Matthew Sproat from Honua Consulting, LLC, on October 15, 2022. Dr. Kahakalau shared the following information on cultural resources, practices, and beliefs:

##### Cultural Resources

- Dr. Kahakalau mentioned the sacred sites include a heiau built by Umi-a-Liloa (which has not been found physically but is mentioned in historic records) and Pu'u Ke'eke'e. There are also iwi kupuna burial sites in the area as well as shelters. Dr. Kahakalau also noted that many other pu'u and geographic features in the area are culturally significant.
- Dr. Kahakalau mentioned that other resources gathered in the area include pōhaku, māmane, and a'ali'i. The a'ali'i in the area have a deeper and darker color than elsewhere,

adding to the plants' cultural significance. There is also a current practice of water gatherers that has been ongoing.

### **Cultural Practices and Beliefs**

- Dr. Kahakalau and a group of Native Hawaiian practitioners have three years' of kūpuna celebrations and ceremonies where they access Pōhakuloa.
- Dr. Kahakalau explained that traveling from one place to another is a cultural practice. As such, all the paths that go through Pōhakuloa were utilized by kūpuna to provide access across the island. These paths have also been used during modern times.
- Dr. Kahakalau noted that gathering and hunting are also cultural practices that take place in the area. These subsistence lifestyle practices carry cultural significance.

#### **5.1.2.3 Mr. Carl Sims**

The interview with Mr. Carl Sims was conducted by Mr. Matthew Sproat from Honua Consulting, LLC, on October 15, 2022. Mr. Sims shared the following information on cultural resources, practices, and beliefs:

### **Cultural Resources**

- Mr. Sims noted that there are endemic species of plants that are wholly unique to the environment of the area.
- Mr. Sims also explained that the nearby adze quarries are culturally significant.
- Mr. Sims also mentioned that the most significant cultural resource in the area is the freshwater aquifer and watershed in the area which feeds the lowlands.

### **Cultural Practices and Beliefs**

- Mr. Sims noted that he and other Native Hawaiians conduct various cultural practices in the area. Protocols include acknowledging ancestors and those who came before them; saying prayers for guidance; and offering ho'okupu.
- Others practice gathering plants for la'aulapa'au and cultural practices (particularly during the hula festival, Merrie Monarch).
- Regarding hunting, Mr. Sims explained that people use the area for hunting regularly (including himself a few times a year).

#### **5.1.2.4 Dr. Michelle Noe Noe Wong-Wilson**

The interview with Dr. Michelle Noe Noe Wong-Wilson was conducted by Mr. Matthew Sproat from Honua Consulting, LLC, on October 15, 2022. Dr. Wong-Wilson shared the following information on cultural resources, practices, and beliefs:

### **Cultural Resources**

- Dr. Wong-Wilson explained that the area is the geographic center of Hawai'i Island and is therefore culturally significant.

- Dr. Wong-Wilson noted the archaeological resources including stone structures that are associated and correlated with geographic locations, navigation, or astronomical bodies.
- According to Dr. Wong-Wilson, there are iwi and burials in the area. There is a significant likelihood that these burials were for ali'i.
- Water is another resource in the area that could be considered culturally significant.
- Dr. Wong-Wilson noted that of the native plants in the area, the a'ali'i have a specific color that is different than other varieties in Hawai'i.

### **Cultural Practices and Beliefs**

- Dr. Wong-Wilson noted that cultural practices in the area include hunting, gathering, and learning about archaeological connections.

## 6.0 Identified Cultural Resources, Practices, and Beliefs

This section provides a summary overview of cultural resources, practices, and beliefs identified for the PTA project area and the broad geographical area based on the results of archival research and consultation and interviews.

### 6.1 Summary of Data Obtained from Archival Research

Archival research revealed numerous cultural resources, practices, and beliefs associated with the State-owned land and the broad geographical area. There are several mo'olelo associated with the broad geographical area ('āina mauna) as well as place-based knowledge in several inoa 'āina associated with landscape features within the PTA project area and the broad geographical area. Pu'u across the project area and broad geographical area are named. There are also specific names of winds and rains that may cover the broad geographical area.

The broad geographical area and project area were historically associated with a variety of resource gathering, including adze and glass quarrying. It is unknown from archival research to what extent the practices of gathering bird feathers occurred within the project area, but likely occurred in the broad geographical area. There are also many native plant species in the project area and broad geographical area, several of which are culturally significant and several of which are federally and State protected. The broad geographical area also served as a trail thoroughfare which connected many of the districts of the island, as shown in the evidence of habitation caves and archaeological resources.

There are many known archaeological sites on State-owned land as detailed in **Section 4.1.3**. Isolated artifacts with Traditional Hawaiian contexts have also been found within the project area. These archaeological resources indicate traditional uhaū humu pōhaku (stone stacking) and noho (temporary habitation) have occurred within the project area. There is also archaeological evidence of iwi kupuna and burial practices occurring in the project area.

Ranching became the predominant land use in the broad geographical area following the Māhele. Cattle, sheep, goats, and pigs were introduced, and hunting became a more common practice in the broad geographical area.

### 6.2 Summary of Data Obtained from Survey and Interviews

The data obtained from this project's initial community outreach and online survey yielded preliminary information about the cultural practices and beliefs that are associated with the broad geographical area.

The concept of mālama 'āina was a recurring theme among survey respondents and interviewees. This expressed connection to the land is central to the Native Hawaiian belief system and results in associated cultural practices and beliefs. Data from many survey respondents and the four interviewees can be extrapolated to show mālama 'āina as an identifiable cultural practice and belief associated with the project area and broad geographical area.

One survey respondent and two interviewees specifically mentioned the Makahiki celebrations which are held annually at Pu'u Kapele. There were 10 survey respondents who mentioned various

pu'u as being named cultural resources. These pu'u range across both the project area and broad geographical area.

Twenty survey respondents and three interviewees mentioned the numerous archaeological resources located on the project area and broad geographical area. These resources include stone structures, heiau, shelters, ahu, and iwi kupuna. Survey respondents which mentioned archaeological resources did not provide specific locations.

Four survey respondents and three interviewees shared that subsistence hunting is a cultural practice that occurs both on the project area and the broad geographical area. Additionally, four survey respondents and two interviewees noted that gathering plants is an ongoing cultural practice for both lei making and la'au lapa'au in the broad geographical area but did not identify if the practice occurs on the project area.

### 6.3 Impacts to Cultural Resources, Practices, and Beliefs

This section summarizes effects to cultural resources, practices, and beliefs from continued Army activities in the PTA project area as identified by interviewees during one-on-one interviews conducted for the current study. These effects are identified here, as stated by each interviewee, and will be analyzed in **Chapter 8.0**.

Mr. Kapele

- Impacts to sacred sites from Army activities such as live-fire training.
- Impacts to access of important cultural and religious sites.

Dr. Kahakalau

- Impacts to land and water resources from Army activities such as live-fire training.
- Impacts to flora and fauna from Army activities such as live-fire training.
- Impacts from wildland fires.
- Impacts to access of important cultural and religious sites.

Mr. Sims

- Impacts to water resources from Army activities such as live-fire training.
- Impacts to flora and fauna from Army activities such as live-fire training
- Impacts to access of important cultural and religious sites.

Dr. Wong-Wilson

- Impacts to Native Hawaiians with cultural beliefs and connections to 'āina.
- Impacts to access of important cultural and religious sites.

## 7.0 Access Policies

### 7.1 Cultural Access

Cultural access to State-owned land is secured through a USAG-HI cultural access process. The process is sponsored through USAG-HI CRM staff, who secure names and information for submission to military police a minimum of five days in advance.

#### 7.1.1 Cultural Access Discussion

Although the Army maintains an access policy, access and/or the perceived lack of access, whether directly or indirectly, were routinely reiterated during interviews for the project area. All four interviews mentioned access; excerpts from the summary interviews in **Appendix C** are provided here:

##### *Mr. Kapele*

- “Mr. Kapele had previously been able to access Pu‘u Kapele without escort, prior to blockades on the old hunting roads, along with fencing which was constructed after the bypass. He noted that visiting Pu‘u Kapele was not associated with a specific time, but rather that he would access it whenever he felt called to do so.”
- “Mr. Kapele also noted that another impact would be the continued barring of access to important cultural and religious sites.”
- “Mr. Kapele has been working with personnel at Pōhakuloa regarding access. He believes that access to his spiritual areas, including Pu‘u Kapele, should be free access.”

##### *Dr. Kahakalau*

- “...in order to gain access to the sacred places, Dr. Kahakalau said practitioners have to work hard with the military. It was easier with the former Commander who was local and married to a Native Hawaiian. For example, with the new Commander, practitioners have to ride in military vehicles to access sacred sites. Practitioners must also be accompanied. For individual practitioners, getting a permit is quite difficult.”
- “Dr. Kahakalau explained that they have been denied access on specific dates, and noted that from the perspective of the Army, their training dates are more important than cultural practitioners.”

##### *Mr. Sims*

- “While the Army has stated that the Army has not restricted access to the area, Mr. Sims says that this is not true.”

##### *Dr. Wong-Wilson*

- “... (Dr. Wong-Wilson) believes that if access weren’t restricted, there would be more practitioners who would access the area.”
- “The general public is denied access to the 23,000 acres.”

- “Dr. Wong-Wilson explained that to get access, one would have to reach out to the public affairs officer. However, in practice, only a small group of practitioners (6-7 individuals) have historically been granted access.”
- “As such, access is very limited to the community and general public, which is an impact to traditions and customs.”

### 7.1.2 Access Research

Prior to Army control of the area, the project area was accessible to travelers, as is documented throughout this study, whether under the governance of Hawaiian chiefs or, later, under private ownership. Numerous historical accounts document travel throughout the Saddle Region. Those accounts are included herein. Currently, public access to the project area is restricted, as it is to all military installations.

Access for cultural practice is, as is with any public access request, allowed on a case-by-case basis at the discretion of the Army, and requires an escort for the duration of their time at PTA. There are no SOPs in place for how access is granted with the exception of hunting, which has a regulated program established for recreational hunting. In September 2018, the *Programmatic Agreement among the U.S. Army Garrison, Pōhakuloa Training Area, the U.S. Army Garrison, Hawaii, the Hawaii State Historic Preservation Officer, and the Advisory Council on Historic Preservation Regarding Routine Military Training Actions and Related Activities at the United States Army Installations on the Island of Hawai‘i, Hawai‘i* (2018 PA) was executed. There is no provision or stipulation in the 2018 PA that prevents or restricts cultural access.

## 7.2 Hunting Access

As noted in **Section 3.8**, modern hunting has largely been a product of foreign contact. From the introduction of modern weaponry to the introduction of foreign game, much of the hunting that occurs in Hawai‘i today did not occur prior to the arrival of foreigners. Nonetheless, modern hunting is an important practice for many community members and practitioners who rely on hunting for subsistence.

Under State hunting regulations, hunting is open to the public within six designated hunting areas (TAs 1 through 4 and 9 through 16) on weekends and U.S. holidays. The availability of units open for hunting is subject to training schedule compatibility and a permit from the PTA Commander. It is also a requirement that these activities “do not conflict with the military mission.” This allowance for recreational hunting can include, to a limited extent, customary practices associated with modern hunting. While modern hunting is a customary cultural practice, it should be noted that PTA’s hunting program was established for recreational hunting activities.

Requests for any such uses are made through the Deputy Garrison Commander or the Commander at PTA. If approved, this individual will coordinate any request(s) with Range Control and others whose operations may be affected. Appropriate access control procedures are established for each approved outdoor recreation activity. Public recreational activities have been conducted at PTA and include archery in TAs 5 and 6; guided hikes; and hunting for birds, pigs, sheep, and goats within specific areas.

## 8.0 Analysis of Impacts from the Proposed Action and Alternatives

This chapter analyzes the impacts presented in **Section 6.3** to assess the potential impact of the Proposed Action and its alternatives on cultural resources, practices, and beliefs relevant to the project area.

The Proposed Action for this environmental analysis is a real estate action (i.e., administrative action) that would enable continuation of current activities on State-owned land. It does not include construction or proposed changes to the current levels or types of activities conducted within the State-owned land (e.g., training, maintenance and repair activities, natural and cultural resources management, or access policies). Potential future actions that are not part of the current Proposed Action would require separate NEPA (and possibly HEPA) and NHPA compliance.

Note that effects to archaeological sites (that may be culturally important) are assessed within the PTA ATLR EIS and the accompanying Archaeological Literature Review (Appendix J to the PTA ATLR EIS). The effects to cultural practices and beliefs that may be associated with such archaeological sites are addressed in the current section.

### 8.1 Alternative 1: Maximum Retention

#### 8.1.1 Land Retained

Under Alternative 1, the Army would retain approximately 22,750 acres of the State-owned land. The Army would continue to have unrestrained access between the Cantonment, impact area and training ranges, and Ke'āmuku parcel; and conduct Army ongoing activities. The Army would continue to permit and coordinate ongoing activities on all the State-owned land by the Army and other PTA users. Alternative 1 is considered the baseline land retention alternative with respect to the area of land that would continue to be used and managed by the Army.

**Section 6.3** lists potential impacts to cultural resources, practices, and beliefs associated with the PTA project area as stated by interviewees consulted for the current study. These potential impacts are evaluated here within the framework of Item J of the OEQC's content guidelines (2012:13), which states that an assessment of cultural impacts should include the following:

An analysis of the potential effect of any proposed physical alteration on cultural resources, practices or beliefs; the potential of the proposed action to isolate cultural resources, practices or beliefs from their setting; and the potential of the proposed action to introduce elements which may alter the setting in which cultural practices take place.

Within the framework of the OEQC content guidelines (OEQC 2012:13), a repeated impact noted by the interviewees for the PTA project area includes physical alteration on cultural resources from continued ongoing military activities. Interviewees noted physical impacts from general Army activities and live-fire training (Mr. Kapele, Dr. Kahakalau, Mr. Sims) and wildland fires associated with Army activities (Dr. Kahakalau). Physical impacts on historic and cultural resources associated with Army activities are mitigated through existing mitigation measures (see **Section 9.1**).

A second general impact noted by interviewees (Mr. Kapele, Mr. Sims, and Dr. Wong-Wilson) and placed within the framework of the OEQC content guidelines (OEQC 2012:13) includes the isolation of cultural practices and beliefs from their setting due to limited cultural access. After the realignment of Saddle Road (DKI Highway), physical barriers were installed blocking previously used access roads that were utilized by cultural practitioners to access sites of religious and cultural importance (M. Kapele). Interviewees (Mr. Kapele and Dr. Wong-Wilson) noted that access to sites associated with traditional and customary practices (such as Pu'u Kapele) are granted by the Army on a case-by-case basis and require an escort.

Although cultural practices and beliefs are somewhat isolated from their setting due to limited cultural access within the PTA project area, this is due to public safety concerns. The continuation of current Army activities within the PTA project area would not reduce the number of days when areas can be accessed for cultural activities, and the Army would continue to provide cultural access per the current access policy. Existing long-term access limitations would, however, continue into the foreseeable future.

### **8.1.2 Land Not Retained**

The Army would not retain approximately 250 acres of the State-owned land. The land not retained is currently administered under DHHL.

There has not been archaeological surveying conducted for the State-owned land not retained under Alternative 1. The Army, however, would no longer be responsible for management of any cultural resources in the State-owned land not retained after expiration of the lease. The State would be solely responsible for the management of resources on the State-owned land, and it is assumed the State would adopt the Army's resource management commitments.

Current cultural access limitations on State-owned land not retained would, in theory, be lifted. Unlimited cultural access would support and benefit cultural practices and beliefs as detailed by survey respondents and interviewees. Potential lease compliance and restoration actions at the end of the lease may result in temporary limitations on access due to public safety concerns.

The parameters for compliance with the lease conditions for the State-owned land not retained would be defined and determined after completion of this CIA, but they would comply with Section 106 and its implementing regulations. Impacts on cultural resources would continue to be mitigated in compliance with these existing regulatory requirements.

Additionally, the lifting of current limitations on cultural access on land not retained would open the area to public access and a potential increase in foot traffic on and around cultural resource sites. Public access is sometimes linked to physical impacts on cultural resources.

## **8.2 Alternative 2: Modified Retention**

### **8.2.1 Land Retained**

Under Alternative 2, the Army would retain approximately 19,700 acres of the State-owned land. Additionally, the Army would retain all U.S. Government-owned utilities and associated access throughout the State-owned land to enable continued safe operation of U.S. Government-owned land and retained State-owned land.

Impacts to cultural resources, practices, and beliefs under Alternative 2 would be the same as under Alternative 1 since limited cultural access would remain. The Army would continue to adhere to cultural resource programs that mitigate physical alteration of cultural resources. The Army would also maintain its existing cultural access policy.

### **8.2.2 Land Not Retained**

The Army would no longer have access to approximately 3,300 acres of maneuver area, facilities, and roads and training trails in the State-owned land not retained. Most of this area is critical habitat designated by USFWS for Palila. The State-owned land that would not be retained has limited facilities and infrastructure, has Palila critical habitat training restrictions, is mostly physically separated from the rest of the State-owned land by DKI Highway, and has cinder cones in the portion that is south of DKI Highway.

There has not been archaeological surveying conducted for the State-owned land not retained under Alternative 2. The Army, however, would no longer be responsible for management of any cultural resources in the State-owned land not retained after expiration of the lease. The State would be solely responsible for the management of resources on the State-owned land, and it is assumed the State would adopt the Army's resource management commitments.

Current cultural access limitations on State-owned land not retained would, in theory, be lifted. Unlimited cultural access would support and benefit cultural practices and beliefs as detailed by survey respondents and interviewees. Other than hunting, survey respondents and interviewees did not specifically mention cultural practices which occur on the State-owned land not retained under Alternative 2. Potential lease compliance and restoration actions at the end of the lease may result in temporary limitations on access due to public safety concerns.

The parameters for compliance with the lease conditions for the State-owned land not retained would be defined and determined after completion of this CIA, but they would comply with Section 106 and its implementing regulations. Impacts on cultural resources would continue to be mitigated in compliance with these existing regulatory requirements.

Additionally, the lifting of current limitations on cultural access on land not retained would open the area to public access and a potential increase in foot traffic on and around cultural resource sites. Public access is sometimes linked to physical impacts on cultural resources.

## **8.3 Alternative 3: Minimum Retention**

### **8.3.1 Land Retained**

Under Alternative 3, the Army would retain approximately 10,100 acres and 11 miles of select roads and training trails within the State-owned land. The approximately 10,100 acres contains vital training and support facilities and associated maneuver areas necessary for USARHAW to continue to meet its ongoing training requirements on the State-owned land.

Impacts to cultural resources, practices, and beliefs under Alternative 3 would be the same as under Alternative 1 since limited cultural access would remain. The Army would continue to adhere to cultural resource programs that mitigate physical alteration of cultural resources. The Army would also maintain its existing cultural access policy.

### **8.3.2 Land Not Retained**

Under Alternative 3, the Army would not retain 12,900 acres of State-owned land. The 12,900 acres of State-owned land not retained under Alternative 3 is used as unrestricted maneuver areas, which is approximately 30 percent and 56 percent of the unrestricted maneuver areas on PTA and the State-owned land, respectively.

Impacts under this alternative would be similar to Alternative 2, Land Not Retained, with a potentially higher level of short-term impacts from land restoration activities over a larger area that may add limitations and/or restrictions on cultural access. If restoration activities were successfully achieved with minimal impact to cultural resources, long-term beneficial impacts would result with the removal of limitations on cultural access for Native Hawaiians and cultural practitioners. Lastly, a greater percentage of land would be opened to public access under Alternative 3, potentially resulting in increased foot traffic to cultural resources sites and possible associated physical alterations.

### **8.4 No Action Alternative**

Under the No Action Alternative, no State-owned land would be retained at PTA after expiration of the lease, and there would be no training on State-owned land. The No Action Alternative would result in the same impacts as Alternatives 2 and 3, Land Not Retained, with the highest level of impacts from restoration activities. As discussed with Alternatives 2 and 3, if restoration actions were successfully achieved with minimal impact to cultural resources, long-term beneficial impacts would result with the removal of limitations on cultural access for Native Hawaiians and cultural practitioners. The greatest percentage of land would, however, be opened to public access under the No Action Alternative, potentially resulting in increased foot traffic to cultural resources sites and possible associated physical alterations. The State would be solely responsible for the management of resources on the State-owned land, and it is assumed the State would adopt the Army's resource management commitments.

## 9.0 Mitigation

This chapter of the CIA considers existing mitigation agreements and presents recommendations for the future to avoid, minimize, rectify, or reduce potential impacts from the Proposed Action to cultural resources, practices, and beliefs within the project area.

### 9.1 Existing Mitigation and Management Measures

The USAG-HI operates a cultural resources program to oversee cultural resource management at PTA. The cultural resources program is responsible for maintaining an inventory of cultural resources; conducting fieldwork to identify, evaluate, and manage cultural resources; conducting periodic site inspections and installing protection measures to avoid or minimize impacts on sites; consulting with NHOs and other parties; and providing education to Soldiers about the importance of cultural resources.

Potential physical alteration on cultural resources from ongoing activities on State-owned land have been considered through Section 106 consultation processes. Ongoing activities within the PTA project area are subject to provisions within the existing 2018 PA among the U.S. Army Garrison, Pōhakuloa Training Area, the U.S. Army Garrison, Hawaii, the Hawai'i State Historic Preservation Officer, and the Advisory Council on Historic Preservation Regarding Routine Military Training Actions and Related Activities at the United States Army Installations on the Island of Hawai'i, Hawai'i (DA 2018). The PA contains stipulations that mitigate adverse physical effects on historic properties, which includes the types of cultural resources assessed in the current study.

The Army's *Integrated Cultural Resources Management Plan for the U.S. Army Garrison – Pōhakuloa* also describes guidelines pertaining to the management of cultural resources under the Army's stewardship at PTA and lists their application to each of nine Standard Operating Procedures for managing cultural resources (DA 2018).

### 9.2 Interviewees' Recommendations

Interviewees shared several mitigation recommendations for the Proposed Action, excerpts from their interview summaries are presented below by project area. See **Appendix C** for a full summary of interviewee's comments related to mitigation.

- Mr. Kapele “believes that access to his spiritual areas, including Pu‘u Kapele, should be free access”
- Dr. Kahakalau “believes that the way to mitigate the impact is to not renew the lease agreements and end training at Pōhakuloa”.
- Mr. Sims “believes that the land not being leased to the military for training purposes would mitigate the negative impacts to the environment, water, flora, and fauna”. Further, Mr. Sims “believes the best mitigation measure would be to allow more access by cultural practitioners. Allowing people access for cultural practices should be ‘set in stone’”.
- Dr. Wong-Wilson notes that “[S]hould the military be able to retain the 23,000 acres ... there needs to be greater access allowed to the public.”

### 9.3 Recommendations of the Current Study

The current study's recommendations for mitigation measures to avoid, minimize, rectify, or reduce potential impacts from the Proposed Action to cultural resources, practices, and beliefs are informed by the analysis presented in **Section 8.0** and the interviewee recommendations presented in **Section 9.2**. This study recommends that the Army formalize a cultural access request process through consultation with Native Hawaiians and cultural practitioners. This formalized cultural access request process would enable Native Hawaiians and cultural practitioners opportunities to promote and preserve cultural practices, beliefs, and resources. In addition, it is recommended the Army consider options to provide unlimited cultural access to specific locations and resources, determined in consultation with Native Hawaiians and cultural practitioners, associated with cultural practices and beliefs.

## 10.0 Conclusion

This CIA has presented ethnographic research from archival and contemporary resources relevant to the PTA project area to make a good faith effort to identify cultural beliefs, practices, and resources of Native Hawaiians and other ethnic groups associated with the project area to assess the extent to which these resources may be impacted by the Proposed Action and its alternatives. The CIA then identified potential mitigation measures that can be feasibly undertaken to avoid, minimize, rectify, or reduce potential impacts from the Proposed Action.

The results of archival and ethnographic research yielded numerous cultural resources, practices, and beliefs associated with the project area and the broad geographical area. Paramount among the impacts to cultural resources, practices, and beliefs from the Proposed Action and the continuation of ongoing military activity is access to the PTA project area. Although current non-formalized limited access policies exist for PTA, interviewees deem the access policy inadequate. Interviewees desire safe, unlimited, and regular access to the PTA project area to engage in cultural practices in which the 'āina (the land) is a significant contributing resource for various cultural practices and beliefs, including mālama 'āina. Although cultural practices and beliefs are, therefore, somewhat isolated from their setting due to limited cultural access within the PTA project area, this is due to public safety concerns. The continuation of current military activity within portions of the PTA project area would not reduce the number of days when areas can be accessed for cultural activities, and the Army would continue to provide limited cultural access to cultural resources, but current limitations on access are likely to continue into the foreseeable future.

Additionally, adverse impacts would continue within the PTA project area from the introduction of physical elements that have altered the setting in which cultural practices take place. This is a general concept repeated throughout informants' comments that the Saddle Region itself, including the project area, is a culturally rich setting which is altered by the presence of military activity.

Other impacts discussed by interviewees for the project area, such as physical alteration on cultural resources, are associated with past actions within the project area and are currently mitigated by existing agreements, including the 2018 PA (DA 2018).

Recommendations identified by interviewees to avoid, minimize, rectify, or reduce potential impacts from the Proposed Action include formalizing a cultural access request process through consultation with Native Hawaiians and cultural practitioners. This formalized cultural access request process would enable Native Hawaiians and cultural practitioners opportunities to promote and preserve cultural practices, beliefs, and resources. In addition, it is recommended the Army consider options to provide unlimited cultural access to specific locations and resources, determined in consultation with Native Hawaiians and cultural practitioners, associated with cultural practices and beliefs.

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**Revised Cultural Impact Assessment Report for the Army Training Land Retention of  
Pōhakuloa Training Area**

**Appendix A: Individuals and Organizations Contacted**

Prepared by



January 2024

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## Individuals and Organizations Contacted

First	Last	Title	Organization, if applicable
Kealoha	Pisciotta	Ms.	Mauna Kea Anaina Hou
Kalani	Flores	Mr.	University of Hawai'i, Hilo
Maulili	Dickson	Mr.	Nā Kālai Wa'a
Hailama	Farden	Mr.	Association of Hawaiian Civic Clubs
Kaleo	Paik	Ms.	Ala Kahakai Trail Association
Haaheo	Guanson	Dr.	Pacific Justice and Reconciliation Center
Taffi	Wise	Ms.	
Nicole	Lui	Ms.	
Dutchie	Kapu-Saffery	Ms.	
Maxine	Kahaulelio	Ms.	
Ku	Ching	Mr.	Former OHA Trustee
Daniel K.	Akaka	Mr.	
Leilani	Hino	Ms.	
J. Curtis	Tyler	Mr.	
Leiola	Garmon-Mitchell	Ms.	
Leningrad	Elarionoff	Mr.	
Angela	Thomas	Ms.	
David	Heaukulani	Reverend	
Ruth	Aloua	Ms.	Malu 'Āina Center for Nonviolent Education and Action
Napua	Burke	Ms.	
Ronald	Fujiyoshi	Mr.	Ola'a First Hawaiian Church (retired)
Cory	Harden	Ms.	
Danny	Li	Mr.	
Stephen	Paulmier	Mr.	
Geoff	Shaw	Mr.	
Fred	Cachola	Mr.	Moku o Kohala
Kū	Kahakalau	Dr.	Kū-A-Kanaka
Justin	Hill	Mr.	
Hanalei	Fergerstrom	Mr.	Na Kupuna Moku O Keawe
Clare	Loprinzi	Ms.	
Mana Kaleilani	Caceres	Mr.	Ohana Kupono Consulting Inc
Melvin K.	Soong	Mr.	The Imua Group

**Appendix A: Individuals and Organizations Contacted**

<b>First</b>	<b>Last</b>	<b>Title</b>	<b>Organization, if applicable</b>
Tom	Lenchanko	Mr.	Wahiawa Hawaiian Civic Club
William J.	Aila, Jr.	Mr.	Department of Hawaiian Home Lands
Lani Ma'a	Lapilio	Ms.	Aukahi
James	Albertini	Mr.	Malu 'Āina Center for Nonviolent Education and Action
Tuahine	Kaleikini	Ms.	
JR Keonekapu	Williams	Mr.	
James	Medeiros	Mr.	
Keola	Lindsey	Mr.	Office of Hawaiian Affairs, East Hawaii
Kamuela	Bannister	Mr.	Office of Hawaiian Affairs, East Hawaii
Samson	Brown	Mr.	Au Puni O Hawaii
Joseph	Kūhiō Lewis	Mr.	Council for Native Hawaiian Advancement
Pi'ilani	Hanohano	Ms.	Kamehameha Schools, Government Relations
Patrick	Kahawaiola'a	Mr.	Keaukaha Community Association
Paula	Kekahuna	Ms.	Maku'u Farmers Association
Mililani	Trask	Ms.	Na Koa Ikaika Ka Lahui Hawaii
Hanalei	Fergerstrom	Mr.	Na Kupuna Moku O Keawe
Carolyn	Keala-Norman	Ms.	
Victoria	Holt-Takamine	Ms.	Pa'i Foundation
Robin	Puanani-Danner	Ms.	Sovereign Council of Hawaiian Homestead Associations
Eugene	O'Connell	Mr.	The Makua Group



**Revised Cultural Impact Assessment Report for the Army Training Land Retention of  
Pōhakuloa Training Area**

**Appendix B: Online Survey Questions and Responses;  
Other Comments and Documents Received**

Prepared by



January 2024

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## Aggregated Survey Responses

Responses to all survey questions are summarized or provided in their entirety in this section.

### Question 1:

I hereby agree to be a participant in the Cultural Impact Assessment (herein referred to as "CIA") for the proposed retention of up to approximately 23,000 acres of State-owned land at Pōhakuloa Training Area. I understand that part of the purpose of the CIA is to conduct oral history interviews with individuals with information about the subject property and surrounding area. I understand that Honua Consulting, LLC will retain the products of my participation (responses to this survey, etc.) for use on the project, but that I will remain owner of any of these products. I have the right to request them at any time. I understand that the material(s) will remain in the possession of Honua Consulting, LLC and that the material(s) may be used for scholarly, educational, land management, and other purposes.

Option A: Yes, I agree to be a participant - A "yes" response will allow you to continue the survey and your answers will be included in the CIA.

Number of responses = 236 (98.33%)

Option B: No, I do not agree to be a participant - A "no" response will disqualify you from the survey and your answers will not be included in the CIA.

Number of skipped responses = 4 (1.67%)

### Question 2:

Please provide your name.

Number of responses = 84

### Question 3:

What is your current profession?

Number of responses = 84

### Question 4:

Where do you live now?

Number of responses = 85

### Question 5:

Where were you born and raised?

Number of responses = 84

**Question 6: Are you associated or representing a specific Native Hawaiian Organization (NHO), 'ohana, or organization in the completion of this survey? If so, please list the entity you are representing.**

Number of responses = 77

**Question 7: What is your association, if any, with the Project Area?**

Number of responses = 82

Spiritual
Cultural Advisor for Military at Pōhakuloa, Traditional Practitioner, kiai
I was included as a cultural practitioner
The Project Area of Pōhakuloa Training Area is on Crown Land, not owned by the State of Hawaii; but under a Trust with Congressional Oversight. I have been trained in Section 106. and Federal Undertakings.
None
None
I will not be answering that right now until 1. I have a better understanding what the army is proposing to do there. 2. Every Kanaka Maoli today is associated to that area so to ask this question hits a nerve with me.
Familial ties to Kaohe (Pōhakuloa)
a resident and landowner on the Big Island
I love it it is sacred ground it is my neighborhood
43 CFR section 50 reestablishing the government to government relations withering the United states
I have been to the "Project Area" many times over the period of 27 years I lived and worked in Hawai'i from 1992-2020
This is my home.
My home and farm is in Puna. What happens there affects the dust and water that flows throughout the island. I also drive past there regularly.
I live on the island, hear the noise, breath the air, and love the mountains. I see the water at Kiholo and have learned much of it comes from the mountain areas.
I live on the island
resident of Moku o Keawe
I live on the Big Island and identify with the area in question and want it removed from the toxic pollution and destruction the U.S. Military has wreaked on this sacred area. The Military is harmful and Colonialist and should be removed from their presence and use of this sacred land! U.S. Military OUT!
none, just a resident with concerns about what PTA does to our land
Research, study, access restricted by US Army, interference with native Hawaiian traditional practices.

**Appendix B: Online Survey Questions and Responses**

While I do not have an explicit affiliation with the 'āina contained within the boundaries of by USARHAW, I conduct pig hunting for subsistence purposes on the slopes of Mauna a Wākea within Ka'ōhe Mauka Ahupua'a and have ancestral lineage to the moku of Hāmākua.
'A'ōhe pilina pilikino, koe wale ka Hawai'i 'ana - No personal connection, save for being a citizen of Hawai'i.
Lineal Descendant of those who inhabited the Hawaiian Islands prior to 1778
I am a hunter gatherer, and religious user
No association
None
My only association is protesting the existence of the PTA
Passion for landscape photography.
Native Hawaiian Cultural Practitioner
I live here.
concerned citizen
None
Lived on Hawai'i Island 17 years. Visited and worked there many other times. My ohana includes people with ancestors who lived there
Live in Pahoia
I am a Hawaii state resident and the Project Area is our public land.
The area is ma uka of my home, it borders places that we go, we pass by there often, we have 'ohana that live just on the opposite side as well.
Resident of Waikoloa affected by the bombing, airspace and clean up of the project.
Resident of Hawai'i Island
Through rare native Hawaiian plants
none, just a nearby resident
None
None
Local
Work
Proximity to area
Ancestral descendant of the people who once lived in this area.
All of the kingdom of Hawai'i
Just spending time on Mauna Loa
Protected Person living in the Hawaiian Kingdom

**Appendix B: Online Survey Questions and Responses**

I'm of Hawaiian kingdom Royalty and USA military is illegal occupying our aina.
I live on Big Island
Just pass through.
Botanical survey conducted by Dr. Lani Stemmerman & associated lawsuits to protect critical habitat.
I am one of the closest homes to the facility - my backyard abuts DLNR and nothing between me and PTA
Native Hawaiian
Kanaka Maoli
None
Hunting
Native Hawaiian gathering of resources for sustainability of life and culture
None
Native hawaiian
None
Father was Stationed in the ARMY around 1945 at POHAKULOLOA/ SCHOFIELD / RED HILL / MAKUA VALLEY/ KAHUKU/GREEN VALLEY ( PUNALU'U)
I am a resident of Hawaii island and a native Hawaiian.
We have conducted extensive ethnographic research, oral history interviews and published studies published studies for the 'Aina Mauna (Mauna Kea, Mauna Loa, Ka'ohe-Humu'ula and the "saddle"land included as part of PTA; participated at one time in the PTA Cultural Advisory Committee, and coordinated field/site visits over the last 20 plus years.
Drive by
N/A
I help produce curriculum and educational programs for teenagers and young adults both locally and globally.
Born and raised on the big island
It is a part of my Hawai'i Island, my homeland.
hunting and land management
National Guard training area 84/98.
As a an ecologist, resident and military 'brat' i feel very concerned about the aina and lease/occupation of land and its use.
I'm listed as a cultural Assessor for Pohakuloa
None
Lineal Descendancy

Local resident, cultural user (Native American) of the saddle region
NONE
I am a 31 year resident of Hawaii
None
Island resident
The project area is located on lands of the Hawaiian Kingdom and as a Hawaiian Kingdom subject, I have an interest in these lands. Past US military activity in the project area has caused physical and biological damages, as well as radiation contamination of these lands in violation of international laws of occupation and in violation of the neutral (military) status of the Hawaiian Kingdom. I served on the PTA Cultural Advisory group for over a year, which turned out to be nothing more than window dressing. I resigned from the advisory group after it was finally disclosed by the occupying country (US), over half a century after the fact, that radiological spotting rounds for the Davy Crockett nuclear weapons system was used at PTA in the 1960's. No effort was ever made to clean up the contamination and nothing was ever recovered since then. The occupier denied the use of radiological weapons until it was disclosed by a contractor that they discovered radiological spotting rounds use on Oahu resulting in an investigation of the occupier's records, which revealed the occupier's secret.

**Question 8: Are you aware of any traditions or customs that may take place near the Project Area or are otherwise associated with the Project Area?**

Number of responses = 82

'Ae, yes. Pōhakuloa is our piko of Hawai'i island. Many sacred sites such as heiau temples, ahu altars built by our Ali'i, and the 'āina and her genealogy itself are sacred to me and to Hawai'i.
Ae , ( yes )
yes
No
Yes. PTA has different Cultural Sites and includes an old Village with burials. An elderly Hawaiian Man is attempting to pick up bone fragments and long bones, and says Pōhakuloa is being used as a bombing site for foreign countries and wants it to stop.
No
None
Well let me just say the map you sent and description of the proposed sight is generic. With the resources of knowledge with today's technology I would have expected a lot better from you folks. This is the norm for the US military to give us bare minimum but Dr Kehau wow here's a hint of advice, give us better of the area preferably old maps, the older the better, even if you have to write over the names of places on the map do it those names deserve to be said out loud over and over. If there are family names associated with the LCA's or Royal Patents we should know about it. Seeing and reading it is will help us channel our ancestors so we can get that knowledge you seek. Many of us here represent our entire ohana and you know how far that could extend. Take this proposed sight and give it the mana it deserves. We all want to repeatedly say the names of those places to give it mana. For far to long our

**Appendix B: Online Survey Questions and Responses**

history has been kept silent. So can we not be silent and can you teach geography that way by the time we pau with this the army will have no choice but to leave it as is.
Yes
no
Not formal Just that they are ceremonial
We are currently working with other native Hawaiian organizations in regard to traditions and customs
Yes
The water in this area brings life to plants and animals. We must honor the land and take care of the earth.
Yes, Hawaiians conduct cultural activities near the project area.
I have friends who go for traditional reasons but I don't. My relationship with the area is more about keeping the environment pristine
No
yes
The whole area is considered sacred and holy to Native Hawaiians and many others. The Military is desecrating this sacred land that is part of the Hawaiian reverence for the area.
no
Yes, native Hawaiian cultural practices.
I am aware of subsistence pig hunting occurring within Pōhakuloa Training Area during certain hunting seasons, a traditional practice. I am not aware of any other traditional Hawaiian practices (e.g. feather collection, 'uwa'u hunting) currently being practiced within the project area as the general public, and particularly kanaka 'ōiwi, are not typically permitted within PTA despite the presence of iwi kūpuna and upwards of a thousand cultural sites, several of which are ceremonial in nature.
'O ke alualu pua'a kekahi hana o ia 'āina, pēlā nō ka māka'ika'i ka'apuni, ka ho'omana, a keu nō i ka po'e hula - Pig hunting is a tradition of that land, as is its status as an important place in the tradition of spiritual island circling excursions, known as "huaka'i ka'apuni," special spiritual meaning and customs may be held by certain individuals especially those involved in hula. Every piece of land is steeped in history, and the land in question was originally held under the tenure of high ali'i Victoria Kamāmalu and Laura Kōnia. Those decedents of these ali'i, and others seeking to honor or connect with them for other cultural and spiritual reasons may find great importance in these lands.
Yes
No
Not aware
None
Countless
Near, yes. Pu'u Huluhulu is a sacred location. There are a few other rolacea nearby also considered sacred.

**Appendix B: Online Survey Questions and Responses**

Yes
yes
No
Hunting gathering religious activities. Caring for and Visiting of ancestral sites. All this disturbed or prevented by the base
Yes, the military has traditionally been put in charge of protecting our country and needs to continue using this training area.
No
150 archeological sites and 21 endangered species just south of the Project Area
Yes, many of it were available and UXO were cleaned up.
The project is area is at the base of Mauna Loa and Mauna Kea and although it has not been inhabited it is a passage way used for prayerful meditation and solice.
Yes
Plant harvesting
Since the time of Princess Kapiolani, the vast majority of Hawaiians turned to the one True God, and the royal family would have objected to the foreigners coming in asking them to go back to such a dirty religion that sacrificed humans. The wokeism is imported from the mainland and practices that people claim are often counterfeit for political agenda. Some radicals would even pretend to be the royal line when the true royal line is conservative.
No
No
Yep
Yes
Yes
Yes
Yes
Yes As all of aina is sacrdr
Yes
Yes
Yes, many traditional customs are significant in pohakuloa
Yes
No
Historic archeological sites
Somewhat
Yes

**Appendix B: Online Survey Questions and Responses**

Watershed/ rainforest resources, dry land forest resources, forest reserve, native bird/wildlife sanctuary, hardwood resources for cultural practices ex: Lua implements/weaponry, musical instruments. Ancestral burials.
Yes
Yes
No
Yes
yes
YES
Yes
Numerous native traditions of these 'āina touch all of Hawai'i, and extend to Kahiki (the ancestral homelands of the gods, goddess, and ancestors of the Hawaiian people). The relationship is also a genealogical one. The god-ancestors from whom Pele and the myriad gods which make the living landscape descend, represent the generations of ancestors from whom the Hawaiians descend.
No
Yes
I feel my awareness is minimal but the calling is not. From archives I have read it seems as though the saddle lands had multiple heaui (temples) with layers of subjects to learn about including training. Each of the island's districts had old trails leading to them. As an ultra runner I have learned the importance of training at higher elevations. As a teacher I also learned the importance of reading the stars and collecting rare bird flight feathers (as one of the ancient currencies that had existed). There are many key cultural stories that I see could be told and brought back alive.
It should not be used for military training
Traditional and or cultural practices may be done anywhere on our island home.
yes
No
Yes! I was with a group from iceland invited by native kanaka for lono ceremony/makahiki sun rise in November when shelling and very early rounds were being let off.
Yes
Yes, Hawaiians gather for their cultural practices. They come to pule.
Yes. Indigenous & Cultural Ceremonial Activities
Yes
A FEW
I am not aware of any specific customs or traditions associated with the Project area other than my own personal customs and rituals.
No

Yes
Prior to western contact, and perhaps many years after, the aboriginal people used the area as a transportation corridor and an access way to conduct religious ceremonies on Mauna Kea as well as to gather dense basalt for tool making. Cultural and religious activities also occurred on or at many of the pu'u (mounds) in the area.

**Question 9: What place names do you know for the project area or areas near or adjacent to the project area?**

Number of responses = 72

Ahu a 'Umi
Malama Aina
ahupuaa Kaohe , Burial grounds within Pōhakuloa
Judd Trail
The Pu'u cinder cones all have names in Hawaiian and the area is know to be a gathering place. Bombing has made an impact to the area and Destroyed vegetation and crucial forests, altering these sites named in mo'olelo.
None
None
I am still looking at the map you sent and I still don't know where it is. Now you know I am being sarcastic but if this is a Cultural Impact Assessment this survey is ridiculous it only shows how generic your consulting firm is.
Not willing to offer names for the project but I do know names of these places
none
Waikoloa and Waimea
Also working with other native Hawaiian organizations familiar with the aspect of names in the project area
Pōhakuloa. Kohala.
Mauna Loa, Mauna Kea, Hualālai, Pu'ukea, Pu'ukapele, pu'uma'au, Napu'ukūlua, Omakoili
Mauna Kea park
the entirety of Hawaii Island is sacred in traditional Hawaiian culture and U.S. military presence here is harmful, illegal desecration
I know it as a sacred place that is being misused and polluted and this needs to stop!
-
Ka'ohe Mauka ahupua'a, Humu'ula ahupua'a, Waimea Crown lands (1848), Keauhou Ii Nene Sanctuary, Kaohe Game Management area, Land Commission Award (LCA Helu 8521 B:1, G.D. Hueu).
The name Pōhakuloa may refer to an akua, a

**Appendix B: Online Survey Questions and Responses**

'O Pu'uahi, ka punawai 'o Lilinoe, ka punawai 'o Hopukani, 'o Ahumoa, 'o Kilohana, 'o Pu'uukea, 'o Pu'ukoko, 'o Pu'umana'o, 'o Pu'umau'u, 'o Pu'uokau, 'o Pu'uokahua, 'o Pu'upōhakuloa, 'o Pu'u'ula'ula. Aia paha 'o Kawaihūokāne i kēia 'āina, 'a'ole paha. - " ", Kawaihūokāne may be located at or near this piece of land.
Kaohe Mauka
Kaohe
None
None
All of them
Pu'u Huluhulu, Kilohana
Pōhakuloa Mauna Awakea Pu'uhuluhulu Mauna Loa Kaumana
Kilohana
Pu'u Huluhulu
Cannot recall. Ask the descendants
Mauna Loa
Umi's Temple and Bobcat Habitation Caves just south of the project area
There are several pu'u in the area (ex. Pu'u Ke'eke'e), not to mention the fact that it is directly between (and on the slope of) Mauna Loa and Mauna Kea.
Pohakuloa
Puu huluhulu. Humuula. Ahu a umi. Puu nene.
The most prominent would be puu huluhulu.
None
None
Mauna a Wakea
Pohakuloa
Pohakulia
Lalamilo, Waikoloa, Pōhakuloa
Really? All aina is sacred especially bombing our drinking water aquifer should be enough to stop the USA violence against my people
Caves burial areas

We can't share that type of information because the USA military will desecrate them if we share that knowledge.
Pohakuloa
Whatever you tell me.
PTA, Gilbert Kahele tec area, Pohakuloa game management area...
Kaohe
Pohakuloa Heiau, Pu'uhuluhulu, Mauna Kea, Kaohe, pu'u manu, pu'u ka pele, na pu'ukulua, ahumoa, kokoolau, naohuleelua, hīnau, ahuaumi heiau, puu o uō
Kipuka, kaohe, huumula, Mauna Loa, puuanahulu
None
Puu keke
Mauna Kea
KA'OHE / PU'UHULUHULU/ GIRL SCOUT CAMP/ BRADSHAW AIR FIELD/ SHEEP STATION/MAUNAKEA SADDLE UP THRU ICE AGE MAUNAKEA RESERVE AROUND TO KEANAKOLU SIDE.
Ahumoa, Ka'ohe
All of the 'āina is sacred, even if the surface has been altered through natural or human actions. There are numerous place names associated with the lands on which PTA is situated, or which adjoin PTA. Many of these places have traditions passed down over there generations which describe how the names came to be. The integrated and inclusive Hawaiian world-view of the honua ola (biocultural environment- landscape), causes problems, of course, for the western approach to managing lands, resources, and describing boundaries. The tidy little "dot on the map" makes it easy to dissociate less-tangible parts of the landscape—the beliefs, customary practices, living culture, traditions and access—from the larger part of the landscape. In words familiar to those who engage in traditional cultural properties studies, these other facets of the landscape are "contributing features" of a larger biocultural landscape that is comprised of both tangible and intangible cultural assets. Desecration through the past and ongoing actions by PTA harm both 'āina and kānaka,
Mauna Loa, monikea
PU'U HULUHULU
Ahu-a-Umi by way of Judd's trail.
Pu'uhuluhulu
na
Pu'u O'o, Pu'u Maile, Lava Ridge, Pu'u Keke
Maunakea
Pu'u Huluhulu, Pohakuloa, Waiki'i, Manā, Keauhou
Puuhuluhulu, Ka'ohe, Puuahumoa
NONE

**Appendix B: Online Survey Questions and Responses**

Just Pohakalooa
Pohakuloa, Humuula, hale pohaku, pu'u hululu, etc
Waikahalulu Gulch, Pohakuloa Game Management Area
Kaohe

**Question 10: Are you aware of any cultural resources in the Project Area or near the Project Area? If so, please list them below.**

Number of responses = 76

Ahu A 'Umi- altar built by Ali'i 'Umi a Lilio who is my ancestor and chief of Hawai'i. He trained his warriors here in Pōhakuloa and the entire region is the piko umbilical cord of Hawai'i island.
Malama Aina
yes, the list would be too long, it is known as a burial and kapu aloha everywhere,
No
The Project area contained medicinal plants, petroglyphs, burials, and was a resource for hunting and gathering, lei making, and Navigational que stones
No
None
Many
There are family heiau, ahu and burials on these lands. We need access to carry out our traditions and practices.
Ohio trees and temples
We are familiar with the watershed and conservation of aquifers under the slopes of Maunakea and Mauna Loa
Hunting. Fishing. Early settlements including farming, living, religious practices. There are many caves where people lived. Many ancient walls and agricultural sites. Also trails and pathways.
Yes, water and natural resources.
Yes, burial grounds, heiau
No
endemic plants, petroglyphs, endemic birds, endemic insects, endemic people who inhabited the region until the illegal U.S. overthrow of the Kingdom of Hawaii
The whole area is worshipped as part of the sacred area of Mauna Kea. It should be removed from Military control. Period.
-
Unknown specifically.

<p>Yes. I am aware of a network of lava tubes that extend for miles below the surface of the project area that preserve within them significant and intact cultural resources that have (so far) been protected from the abhorrent destruction that has occurred already within PTA. I am also aware of intact nesting grounds for the ‘uwa‘u (‘ua‘u) bird, a bird that was traditionally caught in the lands of Pōhakuloa according to boundary commission testimonies from the late nineteenth century. There has also been evidence that other birds traditionally significant to Hawaiians were hunted in these lands, including the nēnē. Precontact site types documented within the project area have included but are not limited to human burials as well as those pertaining to temporary habitation, lava tube shelters, transportation, markers (e.g. cairns), terraces, and lithic and volcanic glass flakes. Furthermore, there is great potential to unearth subsurface cultural features within or in the proximity of existing sites. There are also numerous surface features (e.g. hearths, cupboards) associated with these sites that are indicative of a rich plethora of traditional activities which have occurred within the bounds of PTA. Some of the sites that have been lucky enough to have been preserved have yielded rare finds of organic materials including a ti leaf sandal, cordage, ipu, and charcoal, indicating an area rich in pronounced human activity most likely utilized during activities associated temporary and more long-term habitation to facilitate upland resource procurement. I am also aware of several trails that lead to the lands contained within the project area (which include kīpuka) although I am unsure as to their current integrity given the activities that have been undertaken on the lands of Pōhakuloa over the course of the last 77 years.</p> <p>Since the first archaeological survey of the lands of Pōhakuloa wasn't conducted until approximately 30 years subsequent to the initial military use of the lands and 13 years after the lease of the lands to the Army, it is unfathomable to imagine how many significant cultural sites and resources were subject to obliteration during these spans of time.</p>
<p>English below. He pilina ko Hawai‘i nei ‘āina i ka Hawai‘i ma kona kanaka ‘ana. He pilina ikaika, anoano, a me ke aloha wale ho‘i. Ke lawe ‘ia ka ‘āina, lawe ‘ia kekahi mea o ke kanaka ‘ana. Ma ‘ō loa aku ka ‘āina o kekahi mea e ho‘onanea ai ka maka, he mea ia e pā ‘e‘ehia ai ka na‘au o ka Hawai‘i. Loa‘a nō ka po‘e nona he pilina ikaika, a he pilina ‘ohana paha i kēia ‘āina i hāpai ‘ia a‘e nei, a he waiwai ka mālama ‘ia o ia ‘āina me ke hāpai a ho‘omana‘o ‘ia o ko lākou kuleana ma laila. Hawaiian lands have a special relationship existential with the identity of the people from Hawai‘i. The land is a part of not just a collective cultural and societal identity, but a strong, spiritual, and personal one as well. When a piece land is taken, it piece of identity is also taken as well. In a very actual Hawaiian perspective, land is more than just something appealing to the eye of man, but is something that strikes a deep and spiritual chord in the identity of anyone of Hawai‘i. There are those who have a deep and possibly even familial connection with the lands mentioned above, and the very existence of this land is a very important cultural resource for them. Disregarding this as a intangible and therefore un-important cultural resource would be objectively ethnocentric and cultural biased and intolerant.</p>
<p>substance informs of native plants, animals, and springs as well as places of worship</p>
<p>Yes, I have found sacred area's while hunting</p>
<p>Not aware</p>
<p>None</p>
<p>Mauna Loa, Mauna Kea, Nene birds, Puu Huluhulu, everything in the area is a cultural resource</p>
<p>I'm sure there are, I'd think collecting of materials for lei, hunting for food, etc.</p>
<p>Pōhakuloa training grounds is a culturally significant land site</p>

**Appendix B: Online Survey Questions and Responses**

somewhat
Mauna Kea,our water shed
It is not my place to say. I know they are there and people are afraid to tell the military or others who will disturb them and who already have disturbed them
Many archeological sites along the New Bobcat Trail just south of the Project Area
It lies in the area of our most sacred sites and mauna, multiple ‘ahu, heiau, and also our largest aquifer. Not to mention, it lies ma uka of our forests, kīpuka, watersheds, and even residential areas where any particles from shooting, bombing (“practice”), etc are carried downwind, go into the honua, go into our waterways, etc. Our mauna, our water, our ‘ahu, our heiau, our pu’u, and our people are all significant cultural resources.
Prayer, Meditation
'Aina is a cultural resource to be used for the perpetuation of life not death dealing.
Native carrot. Spermolepis. Native mints. Aalii. Mamane. Portulaca. Kauila. Alaa. Maua. Ae. Wiliwili. Aweoweo. Palila bird. Uou kani. Adze quarry.
not within the area, though at one time the Judd Trail was heading that way.
No
No
Mauna a Wakea
No
Hunting area,and gathering of plants and fruit.
Multiple burials and ‘ahu.
All pohakuloa is sacred All aina is sacred USA must follow kingdom laws Kanawai states you destroy aina you were a threat to sustainability of all These people were giving death sentences before it kills everyone Kanaka wai is still the law of this land and yes if a consultant approves this toxic extension will be in violation of kanawai the legal law of this land Which states
Water table
The entire island is a sacred site
Can't share such important mana'o with the “treaty violators”.
No
No
Cave system within impact range
No

**Appendix B: Online Survey Questions and Responses**

Yes
Watershed/ rainforest resources, dry land forest resources, forest reserve, native bird/wildlife sanctuary, hardwood resources for cultural practices ex: Lua implements/weaponry, musical instruments. Ancestral burials.
Pohakuloa heiau, ahuaumi heiau, judd trail
Sheep, goats, pigs, pheasants, chukar, turkeys,
No
None
no
NUMEROUS STONE AHU (Various Elevations) LAKE WAIIAU / ROCK QUARRY/ BURIALS / PIKO PLACEMENTS
No, it's too private
Many wahi pana (storied sacred landscapes) are known within and adjoining PTA. This is a fact, recorded in the traditions and place names of the region. The Hawaiian worldview of the relationship between sacred places, place names and cultural resources may be summarized by the following statement: Inoa 'Āina and Wahi Pana are tangible evidence of Hawaiian knowledge of the bio-cultural resources that exist all around us. The landscape and its resources are not only valued, but they are integral to the well-being of Hawaiians; and the cultural practices are occurring all around us, whether they are observed or not. (Expanded upon from a statement by Prof. Davianna Pōmaika'i McGregor)
Yes, native Hawaiians, protesting the 30 meter telescope
N/A
The rocks and old flows helps tell some of the oldest stories. The trails shows us the old self-sufficient infrastructure. The water, lava, and other earth elements helps lead us. If accessible, we can look to them to help show us the way.
The cultural resource is the whole island and the military's leases are to expire so stop the bombing and military activity's then
Unknown as area is restricted, no public access.
yes mamane trees for the endangered palila bird! natural water ways .
No
The land is sacred and has sensitive ecosystems . It is nice to see the uau bird returning to the Mauna Kea for example. Deeply concerned about military contamination and depleted uranium etc
Not applicable due to secrecy.
Adze Quarry & Lake Waiau on Mauna Kea
NOT PERSONALLY

**Appendix B: Online Survey Questions and Responses**

No
No
No
While I served on the PTA Cultural Advisory group, several members went on a field trip sponsored by the army (precise location unknown). During the field trip, various cultural resources were discovered. There were ipu (gourds) found in a lava tube and some were intact and still holding water that dripped from the ceiling of the lava tube. There was evidence of bird collecting activity in shallow lava tubes as evidenced by bashing rocks seen in those areas. There was a small gulch on a north-south foot trail where a bridge was built out of dry stacked basalt so that crossing the gulch was much easier. I assume the bridge was built to ease the burden of transporting dense heavy basalt collected on Mauna Kea back to the communities of the collectors.

**Question 11: Is there anything about the project area that’s particularly significant you would like to share? If so, please share the information below.**

Number of responses = 78

Ahu A ‘Umi is sacred to me because Ke Ali’i o ‘Umi A Liloa is my kupuna ali’i. This is a sacred site from a pono and important Chief of Hawai’i built thousands of years ago that stands firm today. Second. Pōhakuloa, the ‘āina is thr piko of Hawai’i Island. The mana and spiritual energy as well as natural energy that exists in this realm is sacred. Disturbing this mana and energy disturbs everyone and everything. Respect what is sacred. Our house of worship may not have steeples or look like a cathedral, mosque, or synagagogue but Pōhakuloa and Mauna Kea are our Houses of Worship and we demand mutual respect.
Malama Aina
needs to be stopped bombing, archeologist are not cultural practitioner and had no accountability of understanding or know place base and destruction within project military base
I am curious as to how the US Government acquired ownership of the land as indicated in the purple colored area of the map of Kaohe area. Is this real estate that was acquired from Parker Ranch?
PTA was given a Lease by BLNR. The entire site of Pōhakuloa looked very different than it does today, due to severe bombing and live fire training. The "Cultural Impact Statement" and EIS should first be about Complying with the Lease that signed. Focus should be on Clean-up and just how the DoD plans to Comply; what native plants will be grown to plant there to Comply with the former lease. No future lease should be considered because DoD needs to Comply now.
No
None
every piece of aina is significant to me
So shared above
It is very close to to 2 towns and the military activities are very disturbing
Currently in consultation with other native Hawaiian organizations pertaining to that matter

**Appendix B: Online Survey Questions and Responses**

Ancient and historical sites for hunting, fishing, living, worship, observing stars and planetary movement.
The water and natural environment must be protected.
This place is unique in the entire world. Why on earth would we bomb such a place? It is an inappropriate place for such training.
I would like the bombing to stop. It is time to focus on peaceful solutions to problems in our world.
This is sacred ground that should be restored to its natural condition then left by the U.S. military
The whole area is sacred to Native Hawaiians. Get the Colonialist U.S. Military out of there and off the Saddle.
-
TMK's 3-3-8-001-013 & 022 belong to the beneficiaries of the Hawaiian Homes Commission Act of 1921, administered by the Dept. of Hawaiian Homelands (DHHL). Removal of these lands from this inventory is prohibited by the ACT, without consultation and approval of the beneficiaries! [HHCA §228 (b)].
The name Ka'ōhe, which literally translates to "the bamboo," may be affiliated with water transportation throughout the ahupua'a and speak to the significance of the richness of water as a natural resource within Ka'ōhe, and thus within the project area.
He 'āina ia o ka wao akua, 'a'ōhe noho 'ia e kānaka koe nā mea pili 'uhane a me nā māka'ika'i kuleana. - This land is of the "wao akua" or holy/godlike region. This essentially means that it was not lived on by people, and was only traveled to for the sake of spiritual journeys and other travels of special responsibility. This perspective still lives on in Hawaiian culture today, and isolated untouched lands are held in great esteem and revered. These lands are not considered lands opportune lands for use, as that would be a kind of defilement of sacred land. This is a very real and important aspect of the current cultural worldview and to view it as intangible and therefore unimportant would again be ethnocentric.
My great grandparents used to go up their for substance and prayer
The military already has too much land, and once in their control most of it is never used, then the usage rule change to the point most people cannot access, and area becomes overgrown. Keamoku is good example, or they restrict access to area's that were open to hunting/ close area, or they put a road through state land so they can more easily access pta while trying to control state land which they have no jurisdiction, they have already taken portions of unit A that were open to public since I was a kid. Too much land has already been taken and military imposes absurd rules for access then want you to pay for the process in the form of a permit. Enough already.
Depleted uranium is a health hazard for the entire community. The lands are sacred and should not be used for military training. Protection of native species must be a priority.
Good revenue for the island and state. Beneficial partners going forward.
100s of native animals are killed every year by PTA exercises. Their lives are significant even if the military says otherwise
Project area includes portion of Mauna Loa itself which is extremely significant. Culturally and otherwise.

The significance was its undeveloped and pristine natural conditions that's provide a habitat for many endangered species of birds. The barren foot of the mountains provides a key role in the nesting habits of many endangered native birds
One of the few places left in the world that should be left in peace and not turned into a dump for military activities.
no
No need
The military has ruined and made toxic extensive areas. The military must clean up the plutonium and I exploded ordinance. The military must open records to the public and repair what damage can be repaired
Pollution from bombings. Noise from training activities. General disregard for the aina.
The leftmost parcels in the project area block public access from the Saddle Road to the New Bobcat Trail and to the proposed Mauna Loa Trail System.
See previous answers. Pu'u Ke'eke'e, 'Ahua'Umi, Mauna Loa, Mauna Kea, etc. These cannot be considered as separate or in a different area than Pōhakuloa. They are all connected.
My concern as a resident is the bombing and sounds that pollute our overhead airspace and nighttime sleep. As well as how and who will clean up the area of unexploded ordinances after the area doesn't serve the Army any longer. Have we not learned from Kaho'olawe, and even here in Waikoloa Village - children playing in the yard, surrounding areas and discover the left over opalala from your training excercises.
The 'Aina is not being used to benefit the people of Hawai'i, instead it is being corrupted with toxic armaments.
Most of the rare native plants and birds species are declining because of the current activities in the project area.
By reserving it for military use, the land has been kept more pristine than if it would have been given to commercial use.
There are very few areas in the star of Hawaii suitable for military training excercises. Training is essential for operational readiness of our armed forces. Without a suitable area in the state, troops would have to be flown to the mainland at considerable time and expense.
No
Yes. Every culture in the history of the world have their tallest mountains as their places of worship and as 'holy places' The Hawaiian people are no different, whether current or historically. The area should be preserved for Hawaiian use.
The water aquafier is affected by chemicals released by live fire excercises in area.
Return it to the Kānaka Maoli!

**Appendix B: Online Survey Questions and Responses**

Everything in the kingdom is sacred as we are all connected to aina (which is our mother that feeds us
See #10
End all Colonial military desecration.
It's located in the middle of an island and should not be used for military purposes
No
Endangered plant species identified by early studies done by Dr. Lani Stemmerman et.al.
As one of Hawaii's closest residents to PTA I am always wanting to understand activities in proximity to my land and any risks they may impose on my family.
This is the piko of the island and significant alterations to the landscape can effect the rest of the island
'Aina (land) and Wai (fresh water) are important resources to ALL who live on an island. Land and water resources should be protected from any destruction, pollution, and/or desecration. As seen with Kaho'olawe, Makua Valley, Red Hill, Pohakuloa and countless other Hawaiian Wahi Pana (cherished places) once these places are opened to military use they are destroyed FOREVER. Regardless of "promises" of cleanup and/or returning the land back to pre use form and function these "promises" cannot be fulfilled once the land and water resources are destroyed! Pohakuloa Training Area should NOT be allowed to expand and should be closed permanently immediately before any more irreversible damage can be done to the land and water resources of Hawai'i Island.
On an island with limited space and resources, every square inch is particularly significant. This area is home to beloved Pu'u, ancient heiau, and is full of sites of worship. It also contains large areas that could be reforested into native wildlife habitat, and is near some of the few areas where native songbirds can still be found.
Gathering areas for food that has been destroyed and has given us no access to it like we used to have before
This area used to be a significant area for gathering of food such as mammals and birds. A place that was used to teach the younger generation the how to hunt and gather.
Any soil, water, mountain or field in Hawaii shall remain purely untouched to qualify as sustainable and sacred to its people.
No
Military training bases are critical both national defense and is a large employer and contributor to the economy
MY FATHER SERVED UNDER COLONEL KUPAU/ I Was Told About Many DANGEROUS THINGS STILL THERE.
It's sad that it's just bombed all the time.
See question 18.
There's lots of pigs and goats, frequent high fire danger war
N/A

This area seems very significant to the historical development of ancient Hawaiians and I hope it can also be available to modern Hawaiians too.
I do not want the military on island anymore, they have not been good about the cleanup of unexploded ordinances on any area in the state used for there purposes of training, poor stewardship should not be excepted!
Our precious land and resources are being desecrated and destroyed by the military combat practices.
Look at any area that PTA has taken over and it is a dead dessert like land scape . where nothing will now grow . There impact on the environment is largely ignored . no ground cover causing big dust storms . who knows what chemicals are in the dust that is lifted into the air and settling in outside habitats contaminating everything
None
The Military should leave after the lease is up. Other areas like where i lived (Concord Naval Weapon Station) have been decommissioned. This cheap lease does little to benefit Moku e Keawe. Also the military should be required to clean up toxins in soil, etc
Stop bombing and the u.s. should pay for the damage at Pohakuloa by its military
This area, is being abused by too many bombings. We travel saddle road at least once a week and have been caught in dust storms. The dust is always coming from the Pohakuloa Training side of the road.
Value and utilize the area for dark skies and natural open space for cultural observance and solitude
NO
I would like to see the U.S. Military leave the area.
No
No
Land in the project area was never ceded by the Hawaiian Kingdom to the US, the State of Hawaii, or any other entity. The US and State of Hawaii continue perpetuating the mistruth that Hawaiian Kingdom government ceded land to the US. It is an undeniable fact that no lands in the project area were ever ceded by the Hawaiian Kingdom government to the US or State off Hawaii.

**Question 12: Are there any stories associated with the project area we should be aware of? If so, please share that information below.**

Number of responses = 64

Stop War
I will leave the moolelo to Kupuna whose iwi reside there.
Unknown.
I am aware of the story of the United States of America (of which I am a Patriot) is involved in the illegal Overthrow of the Hawaiian Kingdom; now "...under a strange form of Occupation" according

to UN Human Rights investigator Dr. De Zayas. PTA military have a Field Manual that explains "Occupation" and how the "Laws of the Occupied" must be followed. Originally, the United States signed the Treaty of Friendship, Commerce and Navigation with No Hawai'i Pae 'Aina (The Hawaiian Kingdom) Recently a letter was sent to Gov. Ige on Nov. 10th, 2020 from the National Lawyers Guild (NLG) made of 6,000 members who voted to send the Compliance letter. Perhaps the story will end well if the USA does the right thing and set Hawai'i Kingdom free.. if America stands for FREEDOM we would be hypocrites if we now know we are Belligerently Occupying Hawai'i Nei and we don't set her free.
No
No
how inconvenient, do you need a history lesson? stories like this are so scarce why would anyone say it for the army?
Plenty
Loud bombs and fires. Shaking the ground and very upsetting to people
Native Hawaiian organization related to this will be assistance for us as we proceed
Yes. See booklists available thru the University of Hawai'i at Manoa and Hilo.
Some years ago a friend of mine told me that she lived here in the 1960s and that there were some poisonous effects from the military happenings up by Mauna Kea
There was no treaty if acquisition, which means it was never legal under U.S. law for Hawaii to become a state. 78% of Hawaiian s signed a petition requesting the Queen be reinstated. Hawaiians weren't who voted for statehood, it was plantation workers and owners who got to vote. An entire, independent country became an illegal state without its citizens getting a vote. Even the United Nations has called Hawaii a "strange" colony of the U.S.
The area is talked about as sacred in many historical Hawaiian stories. It was stolen from Native Hawaiians by the Colonialist U.S. govt. Return it to it's rightful owners!
-
Unknown.
The name Pōhakuloa may refer to an akua, and a lover of Poli'ahu, and is discussed in the Kaao Hooniua Puuwai no Ka-Miki tale. He is affiliated with the akua Kāne and also with Waihu Spring and Lake Waiau. There are many more.
He 'āina ia i kaua ai 'o Kamalalawalu lāua 'o Lanikaula. He wahi kēia i hele mua ai 'o Hi'iakaikapoliopole, a he ko'iko'i ko laila no ka po'e hula. Nui nā mo'olelo o ka nūpepa i laha 'ole, a he mea pono ka maka'ala loa a me ka noi'i nui loa i ka hana pono. - Kamalalawalu and Lanukaula battled here in the story of Lonoikamakahiki. This is also a specifically mentioned spot that Hi'iakaikapoliopole first traveled to after she left Pele. Due to the great importance of the latter story, and especially its importance to those associated with Hula, this land is of importance. There are great numbers of relatively uncommon stories held in Hawaiian news paper, so great care must be taken to ensure that important landmarks in these stories are not adversely affected by the project.
for substance and worship/prayers/halawai/church

**Appendix B: Online Survey Questions and Responses**

If you look close, they are expanding, but not creating jobs for locals, it has always been a select few, or mainland contractors, training is good but they don't use over half of what they have control of, land not being used should be returned.
None
PTA works with the county to assist in aid to people injured on the DKI Hwy.
There are hundreds of stories, do some research on your own
Stories?
The most impactful story I have ever heard about this area is that the military has been bombing an active volcano for over 30
Nothing like having the peace disturbed by exploding bombs.
no
So much to list
It is not for me to share stories I've heard. You should be aware of the great damage that was done and fix what can be fixed and get out
The Saddle Road entrance to the 350 mile proposed Mauna Loa Trail System runs through the westernmost parcels of the project area. This entrance is currently blocked to the public and we cannot access the New Bobcat Trail to Umi's Temple and beyond.
It baffles me that there are stores and mosques in PTA but yet our own people are not allowed to use this area for our own cultural practices, gathering rights, etc. We have 'ahu and heiau there that have purpose and instead have been turned into America's wasteland.
The 'Aina is sacred to life on this island.
Generally the stories you hear will have been made up fairly recently. If you check, over 99% of the Hawaiian people had followed the one True God. Even the top kahunas converted to Christianity. Any stories that survive are made up since then and don't jive with the written records.
No
No
Unexploded ordinances Damage to environment from war games
Unknown
You already know them.
The project area is our water shed for our drinking water hello yeah Research kumulipo
This study does not honor those responses presented in 'olelo Hawai'i by refusing to translate in the EIS.
End the illegal occupation!
.

**Appendix B: Online Survey Questions and Responses**

No
N/A
Before the closure of the area due to Pohakuloa Training Area this area was an important environmental and cultural resource. This area was used by Kamehameha as a training ground for his Kipu'upu'u warrior forces including food and water resources as well as training grounds
Too many to type up on a phone into this little form.
N/A
No
no
DANGEROUS UXO'S BEING PLACED THERE FOR YEARS & YEARS. PLUS THE FOREVER CHEMICALS STILL POISONING WATER AQUIFER & AIR WE BREATHE ..... D A N G E R 
No
See question 18.
N/A
I found these stories from my quest to follow the path of 'Umi leading to a Heaui he likely built or restructured to represent to unification of this island among other things.
It belongs to the Hawaiian people.
na
No
I don't share stories unless in oerson
We have seen live shelling out in Pohakuloa especially at night. There are also the uranium up there.
NO
None known
No
Kapuna has many stories that are theirs to tell.
There is a story about a US presidential executive order that claimed lands in the project area for US military use. The story is untrue. No US presidential executive order has legitimacy in a foreign state such as the Hawaiian Kingdom.

**Question 13: The Department of the Army is proposing retention of up to approximately 23,000 acres of State-owned land at Pōhakuloa Training Area. The project area is comprised of Tax Map Keys 4-4-015:008; 4-4-016:005; 3-8-001:013 & 022; and 7-1-004:007 in the ahupua'a of Ka'ohē Mauka on the Island of Hawai'i. Are you aware of any resources that may be impacted by such a project? What might those impacts be?**

Number of responses = 80

**Appendix B: Online Survey Questions and Responses**

<p>Yes the further destructions of our wahi pana and wahi kapu. The cultural sites and religious sites will continue to be desecrated and destroyed if this lease is renewed. The water resevoirs, rivers and streams polluted. The atmosphere intoxicated with the most harmful substane ; depleted uranium. This land is supposed to be used for benefit of Hawaiians. Hawaiians have for long been on the backburner and treated as strangers in our homeland. This is cruel and evil to allow a foreign occupier military to pay only \$1 lease for 65 years why Hawaiians are being gentrified and overcharged and losing our lands, homes, and being forced to leave. Many Chiefs and Hawaiian Monarchs such as Ke Ali'i 'o Lunalilo allowed Hawaiians to live on his land for free. Queen Lili'uokalani allowed Hawaiians to live in their homes for \$1 a year. This is how we Hawaiians should continue to be nurtured. Hawaiians should receive this treatment and benefits Not the occupying military receiving those treatments and benefits.</p>
<p>Malama Aina , stop war</p>
<p>many na pohaku have been attacked and are now lying down when they were put upright because of the importance In relation to all else there. but you all should know this, many questions here are mahaoui ....I am not comfortable or do we have even have permission to be answering many of these questions.</p>
<p>No</p>
<p>Correction: None of these Parcels are "owned" by the State of Hawaii. Ka'ohe is Crown Land within the Metes and Bounds of occupied Hawai'i. PTA was found to contain at least four sites with Depleted Uranium. There must be NO LIVE-FIRE TRAINING into any of the RCAs. at PTA to prevent further contamination and reducing Depleted Uranium Oxide...which one particle in the human body an cause havoc. Water Aquifers and soil contamination.</p>
<p>No</p>
<p>Ohana</p>
<p>Ask me again on a later date</p>
<p>Water, land, burials, heiau, ahu, wildlife, humans, etc. PTA and its use of depleted uranium!</p>
<p>Water, Land abuse, Toxic waste, erosion, and potential historic artifacts</p>
<p>The bombing is toxic as well as the noise and nature</p>
<p>Water resources and contamination of those waters</p>
<p>Numerous cultural sites. I was part of a University of Hawai'i workgroup which did mapping &amp; excavation of sites in the late 1990's. We were allowed on the site but were usually accompanied by a representative employed by the Army. Damage to the area from shelling and other military activity was evident almost everywhere we worked</p>
<p>Yes, ahupua'a of Ka'ohe feeds many people. If you contaminate this area, you are responsible for poisoning those people and any future visitors to the area. Further, the Department of the Army would be responsible for any contaminants that are carried away in rainwater and runoff downstream.</p>
<p>It is not a matter of resources. It is a matter of protecting an absolutely unique ecosystem.</p>
<p>Bombing the land has no positive impact on the earth. It kills whatever is in its way. It is only destructive. It is most likely going to have a negative impact on the ground water</p>

**Appendix B: Online Survey Questions and Responses**

Endemic trees, birds, plants, insects. Ability of Hawaiian people to inhabit the island placed here for them and to use natural resources safely
The ability to access and protect this sacred land by Native Hawaiians would be destroyed by letting the Military retain control of an area they have repeatedly polluted and desecrated. The impact is simple and already seen as the U.S. Military keeps destroying native fauna and leaving toxins every where they touch the land. That's a pretty negative impact and interferes with Native Hawaiian culture and belief and ritual ceremonies and practices.. U.S. Military out!
-
TMK's 3-8-001-013 & 022 belong to beneficiaries of the Hawaiian Homelands. Any leasing of these lands require beneficiary approval. All these lands are close to the Keauhou Ii Nene Sanctuary, and Kaohe Game Management area, which would be negatively impacted by military bombing and other destructive activities.
The proposed retention by the Army of the state-leased lands of Pōhakuloa means certain death for the remaining cultural sites within the project area. We can only surmise the amount of such sites destroyed between 1943 and 1964, and then between 1964 up until the initial archaeological survey was conducted in 1977. From now until the end of the current lease in 2029, unimaginable and irreversible damage will be caused to the cultural landscape comprising Pōhakula.
Nā waiwai mo'omeheu a'u i hāpai aku nei i luna a'e ma ka hā'ina nīnau 10 me 11. - The cultural resources I previously brought up as answers to questions 10 and eleven. These are real, true cultural resources that can and will be affected.
the water springs below the areas, substance in forms of herbs, plants, animals/livestock, insects
What for, they don't need it or use it, it should be returned to the people
Depleted uranium is a health hazard for the entire community. The lands are sacred and should not be used for military training. Protection of native species must be a priority. Heiau and other cultural artifacts must also be respected and preserved.
None
Habitat for Hawaii's delicate native ecosystem. It's being destroyed. Not impacted but destroyed.
I believe that's why the impact study will be done. To identify those things.
The resource of raw and untouched land. Habitats for native wildlife and native humans, the kanaka maoli
The military has no business using this land for their practice killing.
native species and cultural sites possible destruction
Yes
Further ruination and toxification of that area
Water source for the island.
Hiking trails and access to Hawaiian archeological sites are being denied.
Our water resources, our plants, endemic plants, our animals, endemic animals (birds, 'ōpe'pe'a, etc), and native people are all impacted by the lack of culturally appropriate land use, having to see and hear explosions, shooting, etc (which has caused disorientation, PTSD symptoms, etc), seeing

**Appendix B: Online Survey Questions and Responses**

the pu'u be degraded by use at PTA rather than being taken care of, having our water resources being used to supply PTA rather than our own people who do not all have access to water (clean water). The list goes on and on. Historical trauma is also perpetuated by this use as America's wasteland at PTA. Two of our most sacred sites have a bombing wasteland right in between them and many of us need to pass through there on a daily basis. It's like having a shooting range down the center of the Sistine Chapel. That in no way is appropriate and definitely has an impact on all who lay eyes on it.
Aquafirs located below.
Lake Waiau and the water table. The lake developing microfissures from the vibrations caused by the bombing, which could also "break" the underground water reservoir. And the pollution of the land and water reserves due to toxic armaments left to rot on the land.
The impact would be positive because there would be no more military occupation on that land. Resources may include those that i shared earlier and maybe more
None
Unexploded ordinance is always a concern as well as potential soil contamination from chemicals used.
No
No
As previously stated the water aquafier that we use in Hawaii.
Multiple cultural and archaeological sites are in danger. Deforestation due to military and uncontrolled feral animals have contributed to the endangerment and extinction of many native plants and animals.
Aquafirs Of Hawaii Island are being contaminated with lead & other hazardous materials such as DU, White phosphorous, etc. The dust that originates From Pohakuloa spreads accross the island, it looks like habib!
Water air food sources Huge impact on natural resources
Water resources
Desecration and destruction of all systems
Clean up all your "UXO" now.!
Housing, traffic, unnecessary live bombing while crews continue cleaning up unexploded ordinance elsewhere on the island
No
Unable to respond effectively at this time
No
This is a sensitive environmental area home of native plant, insect, and animal species
Various archeological sites as well as anthropological resources that can be used to perpetuate and restore Hawaiian culture could be destroyed by development by the Department or the Army. Past

**Appendix B: Online Survey Questions and Responses**

archeological surveys have been rushed or completely overlooked in the past as military projects have been fast tracked with rules, regulations, and United States Law not followed.
Yes- the greatest and most scarce resource of an island nation- land. Space that could be forested, provide habitats, not to mention places of worship that are both well documented and lesser known due to the attempted genocide of the Hawaiian people.
Wildlife. These are special places where families spend time together learning how to hunt and provide food. So much has already been taken away, now they are asking for more?
Th resources that would be threatened and impacted would be the ability hunting and gathering of food ( sheep, goats, pigs, birds.) and the ability to teach the younger generation of the techniques of doing such activities necessary to the survival of our people. By slowing the military to continue having control over these land's greatly diminishes my ability as a native Hawaiian provide food for my family and teach my children the necessary skills needed to be self sufficient. History has shown that the military does not see the importance nor gives enough access to our people to practices such activities.
No
No
THE STATE OF HAWAII DOES NOT OWN THE LAND ANYWHERE. WE WERE ILLEGALLY OCCUPIED. THEW OUR WUEEN IN TO PRISON & ILLEGALLY OVERTHREW THE KINGDOM OF HAWAII WHICH WAS RECOGNIZED BY OVER 60 NATIONS AROUND THE GLOBE. THERE IS " NO TREATY " THERE IS NO PAPERWORK. ITS ALL S T O L E N !
No, it's too private
See question 18.
No
Return the land back us native Hawaiian's
Public's accessibility and safety to relive old traditions and paths towards a educational rights of passage. Public trust in managing these lands is an a resource that will be won by proposing to keep managing the lands in the same manner (leaving it worse off than when one comes to it). Water is another worry that I believe should go without saying no matter where we are talking about.
Destruction, unexploded ordinances, and a very poor show of stewardship of land and the surrounding county's. To much secrets not disclosed on ordinances used, and it's affects on the entire island population.
The land is being desecrated and destroyed by military combat practices, like Kaho'olawe. It will never be the same. It's not safe with unexploded ordinances. Our island is small, do not destroy it. Do your combat practices on the continent where there is abundant land.
air contamination soil contamination water contamination unknown side effects of all the artillery used in training
No

The whole island is impacted! There is intrinsic value in the land and as the recent eruption showed this is Tutu Peles land. The ecosystem should be replanted with endemic fauna and remediation steward the transition of use.
No. Every rock and that's Kant is a resource.
Hawaiians also come to hunt. Some is the main source of protein in their diet. They have a spiritual connection to this Aina and the Army is desecrating their land!
Light pollution from military activities and facilities, audible impacts to the surrounding region
NO
All the animals and plants in the area are in danger of being killed, trampled and otherwise destroyed. The Aina will be bombed, shot, dug up and filled with ugly war mongering equipment.
Remnant native forest.
No
The US is responsible for adherence to international laws of occupation while occupying the Hawaiian Kingdom, and as an agent of the US occupier, the State of Hawaii is also responsible for insuring compliance with international laws of occupation. US military activities that have occurred at PTA, and numerous other locations in the Hawaiian Kingdom, are undeniable intentional breaches of international laws of occupation.

**Question 14: Can you think of ways in which any potential impacts can be minimized, mitigated, or avoided?**

Number of responses = 82

Absolutely, end the lease immediately, the military should stop desecrated not only our 'āina but everyone else's 'āina. They need to leave Pōhakuloa forever, leave our 'āina, go somewhere else and train period.
Stop all wars
stop the bombing and destruction
No
Yes. Do not allow further military use of the land other than the beginnings of Clean-up and reforestation. High altitude bombing with cement filled "dummy bombs" and foreign bombing on PTA grounds must cease. The Lease states the DoD's Clean-up Budget would be based on the "Fair Market Value of the Land"--assessed by DLNR Land Division.
Does the Army really need 23,000 acres? The question is what does the Army plan to do with all that land? If practice bombing is to take place then that would have an impact on the land.
Give more money
Before we answer that could we at least know the specific names of these areas.
STOP BOMBING HAWAII!

**Appendix B: Online Survey Questions and Responses**

No. And based on past practices, the military cannot be relied on to prevent or remedy such occurrences
Stop bombing and playing war games there and not lease any more of this land to them
With diplomacy
<ol style="list-style-type: none"> <li>1. Have the military vacate the property.</li> <li>2. If allowed to remain require the on site presence of an archeologist to survey and inspect sites and botanist to do the same for endangered species. And to then require mitigation measures to be developed and put in place and maintained.</li> <li>3. Require the notary to pay a fair market rates with appropriate increases.</li> <li>4. Make those leases for short terms with right of renewal/extension at the sole discretion of the DLNR or whoever is the signatory to the lease.</li> </ol>
Cancel your plans. Leave the area in its natural state.
Do not renew the lease and return the area to Hawaiian control
Make it a national park and stop bombing in it.
Cease all bombing practices
Yes. Keep the U.S. Army off the islands entirely, since it was military action by the U.S. that overthrew the Queen illegally.
Easy. Remove the U.S. Military from control and oppressive occupation of this sacred land.
-
By not renewing the lease of all of these lands to the US Military! There is no great need to conduct such culturally and environmentally disruptive activities on Hawaiian lands. The military has far more space available on the US mainland to conduct destructive exercises, rather than on the limited lands of Hawaii.
Pono ka ho'opane'e, a me ke kūkulu i wahi e hāpai ai ka po'e nona he kuleana maoli ma laila i ko lākou mau mana'o, me ke hiki aku i hana e mālama 'ia ai nā pono mo'omeheu a siwila maoli o ia po'e. - There must be dialogue held with people with a firm grasp on Hawaiian culture, and specifically how actions taken at Pōhakuloa will end up affecting the larger public, and also those with legitimate relationships with the land, and a solution must be reached that honors and respects the legitimate cultural and thereby civil and human rights of those people in question.
not till i have a better understanding of the project from start to finish
Yeah, get out, you don't need the land or use it.
Identify and get appropriate cultural approvals for other larger land areas instead of selecting an island state with very limited land mass. Use simulation training.
We could use some financial assistance in replacing the Waikoloa road.
Shit down the entire PTA. Nothing else will be enough. We will fight until this is accomplished
No live training in the vicinity of Mauna Loa.
Yes. Leave said area and never return. Stop bombing an active volcano. None of that activity is necessary

Leave the Island, clean up your mess and don't come back.
mapping of endemic species/historic cultural sites
If the military left the islands
Get out
No training station on top of the island.
If the Army were to allow public access along the proposed corridor of the Mauna Loa Trail System, this would certainly be welcomed by the island's hiking and cycling communities.
Yes. Another site can be identified on the American continent where land is more abundant. The former PTA occupants can then clean up their mess in ongoing efforts for the next 50 years as reparations and as they should when vacating the site. Our own people (organizations, 'ohana, etc) should not be cleaning up their mess for decades to come as is happening with Kaho'olawe.
Do not use the land for bombing/shooting/ training/fly zone.
Stop the live bombing stop using live ammunition, do not renew the lease, demand clean up of PTA
To return land back to the state and designate it to conservation land.
Keep the general public out of the training area so they don't destroy it. The Army has always done a good job of preserving the features. After all, it is to their advantage to train in a natural setting, so they keep it that way.
Minimize live fire exercises. Do better at identifying and safely removing unexploded ordinance.
No
Leave
Less hard fire
By not using live fire and bombs for training.
Remove human impact from the area.
Clean up & stop polluting, return these conservation lands to actual conservation.
End USA occupation of my home the kingdom of Hawai'i is the only way Only way to avoid impacts is no end the military violence again the Hawaiian kingdoms As no legal form of annexation occurred as 99% of Hawaiian apprised annexation As annexation never occurred you are illegally deciding land use Illegal Racist Systematic racism Get a clue USA military fuel tanks at red hill in the drinking water Failure to follow laws pits consultants at risk of violating international federal and fake hawaii state laws Honest environmental impact statement will never allow it But getting a for profit consultanting firm to decide legal and not legal is out of the consultants expertise as in how many years has your firm done toxic mitigation?

Appendix B: Online Survey Questions and Responses

<p>For profit means if you decide not to approve project you will never get any more military contracts makes you and your firm proves the fix is in</p> <p>For you to make money you have to lie</p> <p>We tell you all land is sacred</p> <p>Every inch is connected to sustainable future for all</p> <p>However you approve this fraud you will be part of killing us all</p> <p>Where do you live?</p> <p>By a atomic waste bombing ?</p> <p>We do and you want to make it ok?</p> <p>It can never be ok</p>
<p>Stop doing them it's excessive and disturbing to wildlife</p>
<p>USA military has no legal standing here. There is NO Treaty of Annexation, no USA state of Hawai'i, and this "lease" is a war crime. We are under prolonged illegal military occupation by USA since 1893, as determined by the Permanent Court of Arbitration at The Hague. Under International Law, the USA continues to commit war crimes against the Hawaiian Kingdom and all Protected Persons.</p>
<p>No more "Rimpac" ✘</p>
<p>Close the training area to army and open it to public</p>
<p>Do nothing</p>
<p>Clear review of documented resource material pre-PTA</p>
<p>Better communication on scheduled events and exercises - especially night training</p>
<p>Yes, stop bombing the land.</p>
<p>No more development and/or use of Pohakuloa Training Area by the US Military and the clean up and removal of the US Military from Hawai'i Island and Hawai'i at large.</p>
<p>Stop bombing the area and clean up all ordinance and remnants.</p>
<p>Yup, don't ask for any land use</p>
<p>One way to minimize the impacts imposed by allowing the military to ration control of said property would be to allow for greater access with less restrictions. Allow for the use of existing roads to be used in and around said property. Simply put the best and most effective way to avoid the impacts made and to prevent further impacts.</p>
<p>N/A</p>
<p>No</p>
<p>YES! PACK UP AND LEAVE NOW!</p>
<p>They could stop using it.</p>
<p>Cease occupation of the 'āina and engage in a community/organization partnerships to restore or at least stabilize the 'āina from further destruction.</p>
<p>No</p>
<p>Damaged has been done time to move out and renew our sacred place</p>

Let competitive management plans have fair access to outbid the current lease agreement(s).
Remove the military from the big island
End the lease, do Not renew the lease.
Only prevention or mitigation is to keep the lands as is and not allow any further military destruction.
None
The army needs to leave. That is only way to mitigate more damage!
Leave
I can see they should be doing a reforestation of the land. They would have to fence out the feral goats and sheep to keep them from eating the new plantings, of course all Native plants to the area should be used!
<b>STOP THE BOMBING AND THE USE OF HIGHLY TOXIC MATERIALS IN THE ARMAMENTS</b>
Design any new facilities in accordance with light pollution standards, retrofit existing facilities to minimize upwards directed lights, restrict the use of temporary area lights and insure lights are extinguished when an area is unused
?
The military can leave the Big Island. That will avoid it destroying the Aina and the People who live here. It would also avoid harming the troops who presently are stationed here illegally. The Aina belongs to the Hawaiians and must be returned to them.
Avoid fire, and vehicular traffic through vegetated areas.
Meet with Kapuna
The land should be cleared of all traces of weaponry, ammunition, and resulting contamination. Burn pits should be excavated and the burnt remnants and contaminated soil disposed of in the US capitol grounds. The Pohakuloa land must be restored to it's natural state as it was prior to the State of Hawaii issuing their unlawful lease to the US Army.

**Question 15: Are you aware of any traditions or customs that may be impacted by such a project? What might those impacts be?**

Number of responses = 77

Absolutely, the heiau and cultural sites that we as Kānaka could enter, have ceremony, cleanse the 'āina and injustices through pule and oli and cleanups, restoring Pōhakuloa are all being restricted from us because the occupying american military is bombing our sacred Pōhakuloa.
Destruction of all life , Kanaka Seek Truth Justice Peace , Hale o Lono
I have been a traditional midwife here for 25 yrs. Am keeping documentation on the history of trauma that native Hawaiian women have with high miscarriage and fetal mortality rates during RIMPAC exercises on aina ame kai. you should be aware already that Native Hawaiians who have a high cultural affiliation with Pōhakuloa and their iwi there, experience a greater impact on them on body, mind and spirit. Statistics show that they are impacted disproportionately.

**Appendix B: Online Survey Questions and Responses**

No
Yes, but under NHPA Section 106, these practices are allowed to be confidential.
No
The plant dying custom
Aina that has lost its history can always be rejuvenated all it takes is for us to know
The negative impacts have BEEN affecting Hawai'i and its people. Cancer is on the rise while bombs continue to fall. The lawsuit is still intact and needs to be fulfilled with a hefty cleanup by PTA
The proper handling of significant artifacts and burial remains, have been and continue to be mishandled by authorities. I see neither any acknowledgment nor any behavior changes unless monitored and enforced by an agency outside of the government.
Ceremony by the Hawaiians
Mamalahoakanawai
Only bad impacts such as not allowing free access, decimation of cultural sites loss of historical physical documentation, which may be unknown at the present time.
Fencing off an area with Hawaiian cultural areas and bombing it has a huge impact on the people and the 'aina.
No one except the military is allowed on the land so it impacts all of us. We're not allowed to hike or walk anywhere near there
All traditional customs will be impacted. Prove the U.S. military has legal right to be on the islands under U.S. and international law or get out.
Remove the Military, their presence is 100% blocking all sacred rituals of the Hawaiian people.
-
Native Hawaiian practices.
Ua hiki ke pā nō nā mea a'u i hapai a'e ai ma ka helu 8, 10 me 11. The traditions and customs I previously brought up on number 8, 10, and 11 could all surely be affected.
substance and worship
I have already been denied access to places I go to talk to GOD, this will just make it worse.
Hawaiian values, traditions, culture and history.
None
Again, hundreds of them. For god sake do some research beyond a survey monkey poll is this really how the military conducts itself?
This is sounding pretty repetitive and leading.
Hundreds if not thousands of cultural traditions and customs are already dead and gone because of this project. The impacts are the cultural traditions and customs to be forgotten or no longer have access to those areas.
So blowing up stuff to practice killing is ok if it doesn't impact local customs and traditions? Really?

**Appendix B: Online Survey Questions and Responses**

live bombing
Our water our Aina or access
Caring for ancestral lands and resources. Impact will be further ruination of the area and increased climate change
Hiking along the old established trail systems near the base of Hualalai is currently impacted.
See previous answers. Everyday that we pass that site to visit 'ohana, get to where we need to, to engage in cultural protocols and practices- is another time that our traditions and customs are impacted. The use of the site is the direct opposite of the many cultural practices that we engage in. Many focus on growth, fertility, and abundance, which is exactly the opposite of what we need to see as we currently pass the site to engage in these practices elsewhere as that land is inaccessible and currently unsafe for our kānaka in its present state.
The tradition of stewarding the land is highly impacted by the desecration of the land and natural resources.
The cultural practices of the hereditary inhabitants of the ahupuaa. While we may be impacted we will not stop.
None. People will surely make up, spread rumors of such traditions and customs that never existed, and so forth.
No
No
I'm pretty sure that the land has a long history of cultural practices before it was appropriated by USA.
Not knowledgeable enough
Hunting and subsistence by Natives Will be affected
The impact would be the continued loss of natural resources and the eradication of Native Hawaiian identity and resources.
The Lāhui should be able to visit sacred site & malama iwi kupuna in these areas. Ceremony & protocol should be performed in the various wahi pana within the PTA.
Yes living a clean environment is a must to have healthy outcomes Pollinating aina what feeds us will force us all to have negative outcomes forever How can you mitigate that? Do you have any degrees in environmental science? You would know better if you did but as I read the questions you believe you can approve it before we even give input The USA illegally occupying over 150 independent sovereign countries not for freedoms of Americans but to control natural resources of the other countries like us in the kingdom of Hawai'i
The ability to hear oneself think
Continued denationalization. ALL traditions and customs are impacted!
All traditional customs will be violated

**Appendix B: Online Survey Questions and Responses**

Bit late now
No
N/A
No
Yes. Training and live fire or ordinance create a hazard that make these areas unsafe.
Access will be denied for all land and water activities by the US Army due to “public safety”. All traditions and customs will be prohibited in the area if the proposed project is allowed to go through.
Protocol and worship, native plant gathering, hunting
Gathering rights. Spiritual practices
Same as described in my earlier comments
N/A
No
THE RIGHTS OF WE THE INDIGENOUS HAWAIIAN KANAKA WHOM HAVE BEEN HERE FOR 1,000 YEARS !!!
No
Almost all traditional and customary practices, wahi pana and 'ohana places are impacted by PTA operations, starting with fences and unexploded ordinance. When one is unable to be on the 'āina, the ability to pass traditions and practices on is diluted. Then the argument used by the agency is, "No one knows anything or goes to the sites, it must not be important.
No
Kupuna iwi's and historical archeological areas
I believe historic model of how this island can be unified and self sufficient is at risk of not being available to follow if this area is being utilized for other means.
That we become a target by foreign powers
Our Hawaiian cultural practices, we mālama (take care) of our land, we do not destroy it. The land is our ancestors, we mālama not destroy them.
hunting gathering of foods .
None
The whole existence of the army there is alarming and offensive while no treaty of annexation was acquired. The state and federal government do not own any land here except by assumption and fraud.
Already stated, Hawaiians use the area for cultural gatherings and should be first and foremost in respect to the aina
The Desecration of our 'āina impacted by military training exercises.

**Appendix B: Online Survey Questions and Responses**

Light and sounds from military activities can dramatically impact the environment across a large area, this includes cultural users such as myself who seek natural open spaces
?
Hawaiians must answer this.
No
No
The area is traditionally a quiet area where residents could commune with nature and exercise daily activities such as transmitting the area on foot and engaging in various cultural activities. US military generated noise, dust, and ground and airborne toxins now have a 24-7 impact on traditional activities which can never resume until the US withdraws their military forces from the area, cleans up their messes, and decontaminates the soil. High perched aquifers and other ground water sources may be contaminated after decades of US military use. Water sampling to investigate for contaminated underground water should be carried out by drilling on a 100' X 100' grid to a minimum depth of 1,000 feet and water samples collected and analyzed by an independent third party.

**Question 16: Are you aware of any traditions or customs that may be impacted by such a project? What might those impacts be?**

Number of responses = 77

End the lease. Military needs to leave our 'Āina and leave Hawai'i for good.
Stop war
There should be studies done and information gathered on fetal morality rates and miscarriages due to RIMPAC exercises. Where are they? Why has the Department of Health refused to release Hawaii Fetal and Maternal Mortality rates the last 20 years.
No
Stop all LIVE-FIRE Training into RCAs. Neutrality, Geneva IV and Geneva V. Show the DoD will comply with current lease requirements for Clean-up. No further destruction of the land.
Avoid war games
Give Hawaiians with 100% bloodline a class on racism.
any impact on any aina when we are dealing with the United States Army should be avoided in fact state owned lands (de facto) should never be leased to the military.
Yes.. STOP BOMBING HAWAII!
Only the constant monitoring of ALL military activities by outside agencies such as OHA could possibly prevent damaging impacts.
Stop the military activity here
Diplomacy

**Appendix B: Online Survey Questions and Responses**

No. As long as the military is allowed free reign, shelling etc. known and unknown sites will be lost
The only way to avoid the potential impacts is not to renew the lease.
Make it a national Park and stop bombing in it.
Stop bombing
Yes. Leave the islands (after restoring to pristine condition).
Remove the U.S. Military presence and control of the land. Return it to Native Hawaiians. That would fix everything.
-
Not renewing the leases to US military.
Please see below.
E like nō me ka' u i hāpai ai ma ka helu 14 - Similarly to what I brought up on number 14.
not till I have a better understanding of the project from start to finish
Yeah give it up, you don't need it
Terminate lease and find another alternative site not in Hawaii.
None
Shut it down
Again.... Repetitive
Leave and never come back. Leave the land alone. Let it heal.
Again, leave the Island, clean up your mess, and don't come back.
mapping
If the military left
Already answered this
Allow hiking along the established roads and trails in the western regions of Pohakuloa.
PTA lease should never have been granted and should be rescinded due to the damage that they have caused to our land, water, and people. They should be fined and have to make reparations for the next 50 years dedicating one week per month of clean-ups to dispose of UXOs.
Choose another location for training, in another remote area, like New Mexico, north/South Dakota, Arizona, Idaho etc.
Do not renew the lease. Land is for the perpetuation of life not a playground for the practice of death.
Allow the Army to keep it so it doesn't fall into general use and be turned into city.
See #14
No
Leave

Appendix B: Online Survey Questions and Responses

No
Plant more trees.
REMOVE HUMAN IMPACT
Stop using this conservation wahi pana as War training grounds. Clean up, restore & return these siezed lands.
End USA occupation
Clean up the trash
End illegal occupation, restore Hawaiian Kingdom government.
No new lease for USA military
Close the training area to military and open it to the public
Building inspections
Better communication between PTA management and local residents. Maybe a web site ...
Yes, stop bombing.
The complete closure of Pohakuloa training area and a complete and thorough clean up commenced immediately
Stop bombing the area, clean up any ordinance and remnants.
As stated earlier
Same as earlier comment
No
CLEAR THESE LANDS OF PRACTICING W A R ! BE RESPECTFUL OF OUR AQUIFER AND OUR LANDS ! STOP ALL BOMBING AND WAR GAMES PRACTICING AND DESTRUCTION OF OUR LANDS, VEGETATIONS, ESPECIALLY ALL POISONS KILLING PEOPLES NEEDS OF SURVIVAL NO WATER.... NO LIFE !
The military could leave.
Cease occupation of the 'āina and engage in a community/organization partnerships to restore or at least stabilize the 'āina from further destruction.
No
Avoided by not renewing any leases
Let competitive management plans have fair access to outbid the current lease agreement(s).
Go completely clean up Kahoolawe and makua on Oahu, Waikoloa kawaihae puukapu on the big island so the people can use the land without fear for farming, building, living on land that may have unexploded ordinances. Clean it up before you use any more land for military purposes.
End the lease contract. Do not renew or extend the lease. Our lands must be taken care of, not destroyed.

not allowing any further military use of hawaii public state lands ! all state lands belong to the people
No
Only solution is to leave and clean up! Please read this i share respectfully as the daughter of a military father. <a href="https://www.military.com/daily-news/2022/06/15/forever-chemicals-linked-hundreds-of-military-bases-are-unsafe-any-level-epa-warns.html/amp">https://www.military.com/daily-news/2022/06/15/forever-chemicals-linked-hundreds-of-military-bases-are-unsafe-any-level-epa-warns.html/amp</a>
Leave
This should not go forward, because the Hawaiians should have this land returned to them
Total cessation and withdrawal of all military training exercises.
Do Less.
The military should pack up and leave after they clean up the mess they have made.
Keep vehicles and live fire out of native vegetation.
No
De-occupation of the Hawaiian Kingdom by the belligerent US occupier and reparations for damages and human rights violations is a good first step.

**Question 17: Are you aware of any traditions or customs that may be impacted by such a project? What might those impacts be?**

Number of responses = 78

LEAVE HAWAI'I. WHY ARE ILLEGAL OCCUPYING AMERICAN FORCES BEING TREATED ROYALLY ON OUR HAWAIIAN LANDS? WHY ARE HAWAIIANS BEING TREATED AS THE FOREIGNERS? WHY ARE OUR SACRED SITES AND CULTURAL SITES AND ANCESTRAL LANDS BEING PROSTITUTED FOR TARGET PRACTICE AND BEING DESTROYED. HOW WOULD YOU FEEL IF THIS WERE YOUR OWN HOME?
Turn Pōhakuloa into world healing center for PTSD
Malama na keiki o hawaii nei. Respect the land, stop bombing, if this is a Hawaiian organization you should already know the best management practices for a area that without a doubt is kapu aloha. abide by these practices.
None
No. This project should NOT proceed for continued use and bombing. DoD must compile monies, resources, and draw up a Clean-up Compliance Plan. The Lease requires Signs in dangerous areas. No "DANGER RCAs" have ever been placed in areas known to contain the Davy Crockett Spotter Rounds. Civilians and Soldiers should be wearing Radiation Detection Badges right now. The NRC stated in reports that water sampling must be done to check on DU contamination.
Honor the land and preserve wild life and waterways
As a good steward.
It will not proceed if we know the specific names of the areas.

**Appendix B: Online Survey Questions and Responses**

STOP BOMBING HAWAII! No it should not proceed
Constant Monitoring with halting power in all operations. But realistically? No! Not at all.
Managed by a environmental group
We propose that native Hawaiian organization Hawaiian Kingdom Task Force facilities be created within the project area as an oversight committee and to partake with the United States military in regards to the project.
Monitoring, monitoring, monitoring. And adequate funding of all mitigation measures.
The best management practice would be to not renew the lease and return the area to the Hawaiians who will malama the area rather than bombing it.
Finish cleaning up the mess you left before such as the depleted uranium etc. and then don't make anymore.
Offer up many community meetings to get feedback from the people who live on Hawaii Island. If we cannot meet in person have meetings on zoom. But you also need to reach out to people who do not have access to computer technology
Require zero impact on endemic plants, birds, insects, humans or environment.
The U.S. Military has ruined the land with toxins and toxic evil behaviors. Give the land back to Native Hawaiians to cleanse and return to it's original sacred status.
-
It should NOT proceed.
Clearly my viewpoint is against the lease renewal, and I am staunch in my belief that this project should absolutely, under no conditions, proceed.  However if, for some reason the PTA lease is renewed, there needs to be not only extensive consultation conducted with the aboriginal kānaka 'ōiwi community, but also a serious commitment to ongoing collaboration with members of said community who wish to be involved. To exclude kānaka 'ōiwi from the process dictating what happens on their 'āina hānau is inexcusable and intolerable. There should be full disclosure to all participants in this process, and full transparency should the United States military wish to proceed on an ethical journey, of which this request for renewal is not. Those kānaka 'ōiwi who wish to conduct traditional cultural practices at sites within PTA (where safe) should be allowed unrestricted access (with reasonable notice) accompanied by a team of EODs for their safety. And cultural resource management staff should work in full cooperation with members of the community. An outreach program to kanaka 'ōiwi and to keiki should also be ongoing, to facilitate learning about the cultural resources present within Pōhakuloa from a firsthand perspective and also to allow for the learning of the traditions and practices that commonly occurred there.  It is absolutely imperative that the lands contained within the bounds of the project area be considered as a cultural landscape. Our kūpuna viewed the world holistically, as a multitude of elements, each forming an intricate network that influenced their world view, their lives, their beliefs and practices. The lava flows and geologic features contained within PTA are just as significant as the physical material culture left behind by our kūpuna, as are the waters that flow towards the project area from freshwater springs and the ua that falls from the sky blown by the winds. A pōhaku is not just a pōhaku. A pu'u is not just a pu'u, and it is unethical and unwise to

<p>consider these as suitable objects for target practice. Each individual element contained within the cultural landscape at Pōhakuloa must be taken into consideration, as it was by our kūpuna, and thoughtfully be considered cohesively with other material elements of culture in conjunction with living kānaka ‘ōiwi to truly comprehend the significance of the Pōhakuloa lands and to preserve what is left for the future generations to come. Our ‘āina has been ravaged at the hands of the oppressor, and the aboriginal descendants of these lands have been victimized through this continued exploitation not only of our lands, but of our cultural resources and the prohibition of our traditional cultural practices that are our birthright. I urge the United States military and PTA personnel to reflect deeply upon these reflections and lead from a place of genuine understanding. An understanding of our precious ‘āina. An understanding of kānaka and the culture of the people whose lands are continually exploited. An understanding of the relationship between the ‘āina and its people. The ‘āina doesn't simply exist to serve for profit (especially to an illegally occupying country), it is that which feeds, but you must mālama ‘āina first and foremost. The continued lease of these 23,000 acres termed the "project area" is a promise of extensive desecration and serves as an insult to kānaka, the ‘āina, and the legacy of our ancestors. So much has been stripped already, will you not stop until the ‘āina is wiped clean of any trace of our history?</p> <p>These suggestions and musings are merely a basis upon which to form the best management practices should, in the worst case, the project proceed and the lands lawfully belonging to the Hawaiian Kingdom be illegally re-leased to the United States military as they continue their belligerent, prolonged occupation of the kingdom and perpetuate their continued failure to comply with international humanitarian law.</p>
<p>Ka ho‘omana‘o me ka ho‘omaopopo mau i ka ‘oia‘i‘o maoli nō ho‘i o ka ‘oko‘a lua ‘ole o ke kuana‘ike me ka mo‘omeheu Hawai‘i. He mea ia e maka‘ala mau ai ka haole. - The remembrance and recognition of the true and unique differences of Hawaiian perspective and culture. It is something that non-Hawaiian people working in Hawaii must be constantly be aware of, lest they end up working to break down an already marginalized culture.</p>
<p>a meeting of the minds amongst the lineal descendants, cultural descendants, and any other parties that can come together with reason</p>
<p>No restrictions on public access none of the nonsense happening now, why do I need a background check, or register my weapons with military, then they want me to pay for process in the form of a permit, no thank you, I worked for federal govt for 20 plus years and probably held a higher clearance than most people there so , this is a hard no for me you can't have it.</p>
<p>None other than to find another training area outside of Hawaii</p>
<p>Invite the public to view live fire exercises.</p>
<p>Do not proceed</p>
<p>I personally would like to see no live fire training on the Mauna.</p>
<p>Listen and obey the native people of the land.</p>
<p>Clean up would be a good start.</p>
<p>mapping and consulting with agencies/persons which have been doing archaeological investigation</p>
<p>No</p>
<p>Do not proceed with any military activity. Clean it up</p>

**Appendix B: Online Survey Questions and Responses**

Minimal use of explosives.
Establish a public hiking corridor along the old established trails in the western region of Pohakulao
'Ohana and k�naka should have rights to access our own self-identified cultural sites (to include pu'u, 'ahu, heiau, vegetation, animals, and any waterways- whether currently running or not) in the area, conduct our own evaluations of their use of the land, and there should be one weekend per month where they dedicate it to clean-up and k�naka can have access to actually see these efforts in action. No further structures should be erected and they should submit monthly soil and water samples from surrounding areas.
My recommendation is to not use this land space for training, and clean up when you leave.
Do not renew the lease. The military may be framing the conversation, but it is God and the people who will have the last word. Vipers in the temple.
It would be good to set aside a path for possible future expressway between Hilo and South/Central Kona that would pass south of Haleakala in the general direction of Judd Trail but modified route to make it more level.
See #14
Use inert rounds for practice / no explosives
Leave
To leave as much land untouched as possible
Create a board consisting a majority of groups that represent K�naka Maoli to decide the best course of action for the restoration of the '�ina.
A'ole, lease is up & should never have been made in the first place.
This leading question As there is no way to mitigate bombing what feeds us The root word in '�ina is Ai which means to feed and you want to continue to bomb my home No thank you
Stop doing it
End the Illegal Occupation
It should NOT proceed
Nope
Unknown at this time
See 16
The project should not proceed and the army should begin clean up and restoration efforts.
The project should not proceed. Historical evidence (Kaho'olawe, Makua Valley, Red Hill etc) shows that the US Army is not in the business of environmental or cultural preservation and is exempt from US law regarding environmental protection. Should the project proceed the project should be

open to the public at all times with no restrictions and the public should be given power to stop the project at any time for any means.
Stop bombing the area, and clean up any ordinance and remnants.
No live fire. Let hunters hunt. Let gatherers gather
Vehicles and equipment being brought on said properties need to be thoroughly cleaned of any and all vegetation. To prevent further introduction of invasive plants and insects. Allow for significantly greater opportunities and access to said properties for the cultural practice of hunting and gathering.
no
RECOMMEND DISMANTLING THIS OUT OF DATE DESTRUCTION TO MANKIND & EARTH
Remove spent munitions and leave.
Cease occupation of the 'āina and engage in a community/organization partnerships to restore or at least stabilize the 'āina from further destruction.
No
Quite while ahead
Join in some of the approved mission statements of the surrounding mountain area management plans.
See previous answer
No, do Not proceed. The lease must not be renewed. Please do Not proceed. Our Fire Goddess Tūtū Pele lives on our island and she sent her lava flows near to Pōhakuloa.
It should not proceed
None, the Army has a good policy of policing the areas used.
Also read <a href="https://www.army.mil/article/109769/picatinny_to_remove_tons_of_toxins_from_lethal_rounds">https://www.army.mil/article/109769/picatinny_to_remove_tons_of_toxins_from_lethal_rounds</a> . The area should be tested! What are levels now? What happens with soil leaching? What are levels of barium nitrate and perchlorate ?
Leave. No.
Other than plants that will help with soil control, maybe water drops to keep the dust storms down. When there is a construction sight the contractor are required to have dust control. The army should be required to keep it down also. You do remember history of the dust bowl?
TOTAL CESSATION & WITHDRAWAL OF MILITARY
Continue open engagement with the community to inform of activities that have a regional impact, actively seek to minimize impacts to the local community through policies and practices that avoid any unnecessary disturbances. Expand opportunities for community interaction beyond a single open house each year. e.g: Send staff out to provide presentations on biological or cultural resources, recent fieldwork, etc.

no
None.
No use of explosive projectiles or depleted uranium projectiles.
No
No, the project should not proceed. What should proceed is a withdrawal of US military equipment and a thorough clean up of the area. A civilian committee with members elected by regional communities should oversee the withdrawal and clean up. The committee members should be compensated for their time and effort rather than being expected to volunteer.

**Question 18: Are you aware of any traditions or customs that may be impacted by such a project? What might those impacts be?**

Number of responses = 73

DEFEND PŌHAKULOA! THIS IS THE HAWAIIAN KINGDOM. NOT AMERICA. EVERYTHING OCCURRING IS ILLEGAL UNDER INTERNATIONAL LAW, HAWAIIAN KINGDOM LAW, AND U.S. CONSTITUTIONAL LAW.
Make Peace NOT war
What impact did the bombing have at Kahoolawe ? why is allowed on the aquifers for all of Moku o Keawe?
Not at this time
More efforts of "Friendly Relations and Diplomatic discussions on "Exit Strategy". NOTE: The lands of Pohukuloa are NOT owned by the State of Hawaii, who actually have no legal right to issue any future lease. Also, it is good to know about the Trophorestorative enzyme called "P4D1" which was discovered after the bombing of Nagasaki and Hiroshima and reducing effects.ofutatkons and birth defects caused by radiation.
Can the Army be transparent with how the land would be used?
Stop capitulating to the racist Hawaiians.
Lots, but I will reserve for now, mahalo
Our military has still not cleaned up their previous destruction. They continue to damage our environment to this day. Increasing their domain is moving in the wrong direction. They have not adequately justified their need for this land abuse.
Delay the lease approval till, more people know and have a chance to voice their concerns
Under DoD instructions 4710.03 We here at IDP/HKTF would like to continue a mutual agreement for reestablishing a formal government to government relationships
The military is getting/taking a free ride in many areas in the islands such as Pōhakuloa and Makua. It needs to stop.
We are living in a time of great destruction. The pandemic is a direct result of man's ignorance. If we are to have a home on earth- We must create spaces of sanctuary and care for the environment.

**Appendix B: Online Survey Questions and Responses**

If you want to do the best with this land, then work on creating a place of sanctuary. Protect the land.
Once again, I would like to say that uniquely uniquely situated spot such as this in a tiny island chain with situations that don't exist anywhere else in the world is an inappropriate place for any military activity.
No
Please leave the islands altogether. You were never meant to be here.
End the Military occupation and end the desecration of our sacred Mauna Kea/Mauna Loa. Return the land to Native Hawaiians.
Please stop bombing the land and polluting the air
I don't support the military practices that PTA does to our land. The noise pollution, the air pollution that goes to Kona, the damage it does to our land...many many many residence feel the same way. We don't support PTA - period.
US military needs to release the lands on Oahu as well. The impact to Honolulu is even greater, due to the limited space and large population there!
No. Mahalo.
Ma ka mo'omeheu 'oia'i'o o ka Hawai'i, 'elua wale nō mea e hehi ai ke kanaka ma kahi malihini, 'o ke kuleana, a me ke kama'āina. He maha'oi, a he hō'eha ka hele wale o ke kanaka. Ma 'ane'i ho'i e 'ike ai, 'o kēia hanana a ka pū'ali koa i Pōhakuloa, he kuleana 'ole, a kama'āina 'ole. He hakina kolonaio nō ia.- In an again real and actual Hawaiian perspective, there are only two reasons one would go to a place one is not framiliar with. They are "kuleana" or responsibility, and "kama'āina," or interpersonal connections. If one does not a specific responsibility to a place or have people to welcome one to an unfamiliar spot, it is considered rude to go there. This is the fundemental reason why the U.S. training camp at Pōhakuloa is so painful and displeasing to people of Hawai'i. It is a vestige of Hawai'i's colonial history.
not at the current moment or told othewise
No
Thank you for the opportunity for input.
I support the continued lease of the training area for the benefit of military training.
I will fight against PTA and the destruction of the Hawaiian ecosystem until I die. Get out of here.
Nope
The US has a long history of taking advantage of the native Hawaiian community and their land. Native Hawaiians had their land stolen and have never been raised up to their true status in these islands. They remain oppressed and in a state of minority. Hawaiians needs help retaining our sacred lands and lifestyle. With the growth of industrialism and capitalism, the Hawaiian lifestyle is loosing its foothold and more and more Hawaiians are losing our way of life due to expensive living conditions and laws put in place that do not allow us to live in the manner in which we are most accustomed to.
I think I am clearly stating I do not believe a weapons training facility is not welcome here.

Appendix B: Online Survey Questions and Responses

no
The military took our Aina by force and did nothing for the Hawaiian people but destroyed our land and tainted our water
Clean it up and get out immediately
Please consider leaving this area and island.
There is conflicting signage at the two entrance gates of the public hunting area at the western end of Pohakuloa, between the old and the new saddle roads.
Eviction notice is long past due. Why wait until the lease is up? They've proven that they have been irresponsible occupants. Anyone with sight can see this. Hawai'i is not responsible for America's warfare with our limited resources.
The impact of heavy vehicles on our 1 road to and from the site is highly affected and traffic only continues to increase.
I can only share my Aloha and resolve to free the land from further injury by the military and state.
We need protection of the Army. If we are ever invaded, all hope of protecting any culture or anything else is lost. Invaders won't care. Just look at what's happening in Ukraine.
In the past, the US military were not the best stewards of the land. However, they have adapted to being more environmentally conscious in accordance with applicable laws. I support continued operation of this training area.
No
Leave
Yes, Mahalo for the opportunity
I doubt my concerns will be considered, but I know I am not alone, and our voices will be ignored, as usual.
It is way past time for the USA Military to begin to make right all the wrong done to the peoples Of Hawaii for 130+ years. The past cannot be undone but, America, in good faith, can begin to pursue a pono direction by releasing, restoring & returning this vital wahi pana to conservation & preservation. Ke oluolu?
Yes End this toxic consultant process I live an hours drive to Pohakuloa and the photo I uploaded of the Mauna Loa eruption from my home Imagine how close this active volcano can do to us? Then add a bombing range into an active volcano is stupid and does not give a shit about us here
130 years of illegal military occupation and denationalization doesn't change the fact that this is the Kingdom of Hawai'i, an independent nation in continuity since 1843 under International Law.
No treaty = War Crimes USA is illegally occupying the Hawaiian kingdom.
Pull the Army out of Hawaii. Try CO or AZ

**Appendix B: Online Survey Questions and Responses**

Nope
I fully support the PTA mission but better communication on usage - current, past and future is required.
Please respect the sacredness of the aina and stop destroying it and creating long lasting potential danger and damage.
Aloha 'Aina Oia I'o! We will forever love and protect our 'Aina (land). Until the last Aloha 'Aina!
Stop bombing the area.
bases like this are critical to training. the military makes all attempts at working with local population. It's is the squeaky wheel complainers that make the base sound bad.
TIME TO GO ! WE ARE TIRED OF DESTRUCTION ! PLEASE LEAVE GO ELSEWHERE !
The military are terrible kind stewards.
The links below will take you to several studies which cover the 'aina of PTA and larger 'aina mauna. <a href="https://www.kumupono.com/wp-content/uploads/2021/12/2001_11_26_Ahu-a-Umi-Keauhou-Kona-Hawaii-PDF.pdf">https://www.kumupono.com/wp-content/uploads/2021/12/2001_11_26_Ahu-a-Umi-Keauhou-Kona-Hawaii-PDF.pdf</a> <a href="https://www.kumupono.com/wp-content/uploads/2021/12/2004_03_31_Humuula-Piihonua-Hilo-Hawaii-PDF.pdf">https://www.kumupono.com/wp-content/uploads/2021/12/2004_03_31_Humuula-Piihonua-Hilo-Hawaii-PDF.pdf</a> <a href="https://www.kumupono.com/wp-content/uploads/2021/03/Mauna_Kea_Kuahiwi_Ku_Hao_i_ka_Malie_KPA02_0827-4.pdf">https://www.kumupono.com/wp-content/uploads/2021/03/Mauna_Kea_Kuahiwi_Ku_Hao_i_ka_Malie_KPA02_0827-4.pdf</a> <a href="https://www.kumupono.com/wp-content/uploads/2021/03/HiWaikii61-Vol-1c.pdf">https://www.kumupono.com/wp-content/uploads/2021/03/HiWaikii61-Vol-1c.pdf</a> <a href="https://www.kumupono.com/wp-content/uploads/2021/03/HiWaikii61-App-A.pdf">https://www.kumupono.com/wp-content/uploads/2021/03/HiWaikii61-App-A.pdf</a> <a href="https://www.kumupono.com/wp-content/uploads/2021/11/HiNars80-Puu-Makaala-b.pdf">https://www.kumupono.com/wp-content/uploads/2021/11/HiNars80-Puu-Makaala-b.pdf</a> ; <a href="https://www.kumupono.com/wp-content/uploads/2021/03/">https://www.kumupono.com/wp-content/uploads/2021/03/</a> <a href="https://www.kumupono.com/wp-content/uploads/2021/03/Mauna_Kea_Ka_Piko_Kaulana_o_ka_Aina.pdf">https://www.kumupono.com/wp-content/uploads/2021/03/Mauna_Kea_Ka_Piko_Kaulana_o_ka_Aina.pdf</a> <a href="https://www.kumupono.com/wp-content/uploads/2021/11/2006_05_06_Mauna-Kea%E2%80%93Ka-Piko-Kaulana-o-ka-Aina-Hawaii-Island-OH-PDF.pdf">https://www.kumupono.com/wp-content/uploads/2021/11/2006_05_06_Mauna-Kea%E2%80%93Ka-Piko-Kaulana-o-ka-Aina-Hawaii-Island-OH-PDF.pdf</a>
Keep the bathroom/ rest area open and clean please and thank you
Enough is enough to much damage done over the years time give replenish the land clean up all exploded and unexploded ordinances
I appreciate this survey being accessible.
The military has a bad reputation for use of Hawaiian lands, from unexploded ordinances to fuel contamination of underground aquifers, pollution of waterways etc. if you can't keep it clean then you shouldn't be allowed to use it for any military activity.
Again, do Not renew the lease.
End

The military must vacate the Pōhakuloa area and return the land to the Native Hawaiian people. Mahalo.
soil and air quality samples should be taken of current areas occupied by PTA
No
Im deeply concerned about continued “training “ and long term impacts to soil, ground water and flora/fauna. Also the vast lease does little to support kanaka or local economy. I have seen the over militarization of Oahu and it saddens me... i can list a plethora of whys!
You are bankrupt. We don’t want to be part of your wars.
I do understand the need for the army to train, but the lease for 1.00 is unacceptable! The army should be paying an adequate amount of funds to compensate the Hawaiian people!
STOP DESTROYING OUR ‘ĀINA
I would like to hear of a way to protect the aina,but help the finances of the BIG ISLAND
No
No
I support the US withdrawal of all military forces from the Hawaiian Kingdom and commencement of negotiations for a peace treaty and reparations for harms committed by the US against the Hawaiian Kingdom's natural resources including but not limited to lands, fresh water sources, airspace, the ocean, and citizens.

**Question 19: If there are any documents you would like to share, feel free to upload them here.**

Number of responses = 3

**Question 20:**

**CONFIRMATION OF PARTICIPATION - I hereby understand and agree that the answers I have provided in this survey are to be included in the Cultural Impact Assessment (herein referred to as “CIA”) for the proposed retention of up to approximately 23,000 acres of State-owned land at Pōhakuloa Training Area.**

Number of responses = 86 (85 “yes” responses; 1 “no” response that was removed from CIA)

Numbers of skipped responses = 154

**Question 21 (OPTIONAL): If you would like to share your contact information, please do so below. This information will be redacted from your response in the CIA to protect your privacy.**

Number of responses = 32

Numbers of skipped responses = 208

Four individuals provided additional resources and comments to Honua Consulting which are appended to the CIA here. These resources and comments informed the archival research and cultural context of the document. These resources and comments were not, however, considered in the analysis presented **in Section 8.0.**



**Comments and Documents Received from  
Mililani Trask**



**From:** Mililani Trask mililani.trask@icllchawaii.com

**Subject:** Pohakuloa Survey Responses

**Date:** October 14, 2020 at 4:56 PM

**To:** community@honuaconsulting.com

**Cc:** Mililani Trask mililani.trask@icllchawaii.com, Lakea Trask lakeatrask@gmail.com, Leilani Lindsey Ikaapuni@gmail.com, Damien Trask onaonatrank@gmail.com

MT

Aloha Trisha,

I tried using the on-line survey but it keeps closing before I can finish it!!!!

I am sending you this input because of this. Please put it as my survey response.

I think you will find 2 efforts in your survey box, neither completed.

Name: Mililani B. Trask, I reside at Olaa Hawaii. PO Box 6377 Hilo HI 96720

Responses:

I am a cultural practitioner, an indigenous Hawaiian, and have used the Pōhakuloa Area for cultural purposes over the years.

I have hiked the Pohakuloa area and used it for gathering purposes for pohaku, including Kuni stones, and also for plants including medicinals.

I have used the data in various Reports over the years as well as some of the chants & songs about the area and island.

In 1915-17 I learned about the DU at Pohakuloa and radiation problems. I took all the stones I had gathered back to the areas from which I had collected them near Pohakuloa because I was afraid of radiation poisoning. Prior to that time I had gathered at Maunakea, Pohakuloa & Mauna Loa but thereafter I limited myself to the Maunakea side of the Saddle Road.

Some of the resources I have used are the modern archaeological & historical data including the rare plant surveys by Robert Shaw have not been updated for awhile.

I gathered & hiked this area for years until the radiation problem arose.

XX

MBT

Some of the Resources I have used that I am identifying & requesting be included in the CIA are listed below.

I AM INCLUDING & INCORPORATING THESE RESOURCES BY REFERENCE IN MY ANSWERS TO THIS SURVEY.

PLEASE INCLUDE THIS EMAIL AS PART OF MY RESPONSE TO THE SURVEY.

1. 1993-TITLE Archaeological survey and testing for the Saddle Road improvement project, Pohakuloa area, Island of Hawaii by Welch, David J., International Archaeological Research Institute,

2. 1996-

An archaeological collections summary for Pohakuloa Training Area, Hawaii

by the U.S. Army Corps of Engineers, TITLE Archaeological surveying Pohakuloa Training Area (PTA)1996,

3. 2004

An overview of the archaeological context of Pohakuloa Training Area in Hawaii island

Godby, William C., Carson, Mike T.

Adzes Pohakuloa; Archaeological surveying Pohakuloa Training Area (PTA); Bird hunting; Pohakuloa Training Area (PTA); Saddle Road; Volcanic glass quarries and quarrying.

4. 2004

The Pohakuloa Chill Glass Quarry Complex, U.S. Army Pohakuloa Training Area, Hawaii Island, by Williams, Scott S. locations: surveying Pohakuloa Training Area (PTA); Pohakuloa Chill Glass Quarry Complex; Pohakuloa Training Area (PTA); Saddle Road

5. 2012

Ethnographic study of Pohakuloa Training Area and Central Hamakua District, Island of Hawaii, State of Hawaii, final report

McCoy, Patrick C., Orr, Maria, Pacific Consulting Services, Inc.

Archaeological surveying Pohakuloa Training Area (PTA); Cultural property Hawaii Island; Natural resources; Pohakuloa Training Area (PTA)

6. 1997

Title: Rare plants of Pohakuloa Training Area, Hawaii by Author: Shaw, Robert Blaine. Part I & Part II.

Comment: Trisha, this is a two part study that uses the Land Condition-Trend Analysis (LCTA) that was designed to inventory and monitor the Army's lands.

One of the major components of LCTA is a floristic inventory. The LCTA floristic inventory for Pohakuloa Training Area (PTA) began in November 1988 and continues today. Numerous rare and endangered plants were discovered through the course of the initial inventory, prompting more extensive surveys and research. These surveys have added valuable information concerning the biology, ecology, and abundance of the rare taxa found on the installation. The report introduces the physical features of PTA, summarizes major threats to rare plant species on the installation, and outlines and illustrates information concerning each taxa. An updated list of species inhabiting the installation is provided as well.

species inhabiting the installation is provided as well.

URL: <http://www.denix.osd.mil/nr/upload/97-23-Rare-Plants-of-the-Pohakuloa-Training-Area-Hawaii-Part-I.pdf>  
<http://www.denix.osd.mil/nr/upload/97-23-Rare-Plants-of-the-Pohakuloa-Training-Area-Hawaii-Part-II.pdf>

7. 7. Kumu Pono Associates (Kepa Maly) has done several studies on Maunakea & Kahohe. These studies include data on gathering as well as wahi pana of Pohakuloa that also lies in Kahohe. There are significant sites involved including the trail of Umi that leads to the Ahu A Umi. The trail comes in from Hilo side & Kona side.

8. I am requesting the Honua Consulting contact & interview Kepa Maly and his wife Onaona (Kumupono Associates) about the Kahohe area (which is a component of Maunakea in Hawaiian Cosmogony).

Pohakuloa is part of the larger cultural landscape now referred to as "Maunakea" . The Hawaiian Cosmogony, traditional belief system and cultural practices identify Pohakuloa not only as an area between Maunakea & Maunaloa, but clarify that the God Pohakuloa resided at Lake Waiau. Hawaiian Cultural & religious practitioners, including myself, understand & utilize Pohakuloa as one part of the biocultural cultural landscape which we access for cultural reasons.

The following is a verbatim quote from Pohakuloa - 'AinaMauna Historic Notes' Compiled by Kepa Maly, Kumupono Associates) re: the "Inoa pana"of the traditional area.

"Inoa Pana o ka 'Āina Mauna (Storied Place Names of the Mountain Lands)

While much has been lost since western contact, the persistence of inoa pana that have survived the passing of time, give us a glimpse into the Hawaiian knowledge of place, and the cultural attachment that Hawaiians share with their biocultural landscape. These names are among those that demonstrate the Hawaiian familiarity with the sites and features, and varied elevations of the mountain regions. In ancient times, named localities served a variety of functions, including but not limited to — heiau or other features of ceremonial importance; triangulation points such as ko'a (land markers for fishing and bird catching areas; residences; areas of planting; water sources; trails and trail-side resting places (o'io'ina), such as a rock shelter or tree shaded spot; sources of a particular natural resource or any number of other features; or the names may record a particular event or practice (e.g., use for burials, or making of ko'i (adzes)) that occurred in a given area. (emphasis added by MBT)

Mauna Kea – May be literally translated as “White Mountain,” because during the winters, the summit is often covered with snow. The peak of Mauna Kea (Pu'u Kūkahau'ula) stands 13,796 feet above sea level. Also, early native accounts (cf. Malo 1951 and Kamakau 1991) suggest that other translations are appropriate. One such account, recorded by an elderly Hawaiian source in c. 1917 by researcher and translator, Theodore Kelsey tells us that “Mauna Kea” may also be translated as “Wakea's Mountain.” Wākea, also written and pronounced as Ākea and Kea, was the god-father of the island of Hawai'i. The island child was born by Papa or Haumea, the goddess who gave birth to islands. Mauna Kea as a place name, can be traced to the earliest written and cartographic resources of the Hawai'i; for examples see the Journals of Captain James Cook (Beaglehole 1967) and S.C. Wiltse (in Register Map No. 668).

Houpo-o-Kāne

also written

Ka-houpo-o-Kāne – May be literally translated as “The chest (bosom) of Kāne.” The god Kāne is believed to be foremost of the Hawaiian gods, and is credited with creation, procreation, light, waters of life, abundance, and many other attributes. A land being likened to the chest of Kāne, can imply that the land was cherished and blessed by the god Kāne. (This name is now written Hopukani; known as one of the springs near the 10,000 foot level on the north side of Pōhakuloa Gulch.)

S. N. Hale'ole's tradition of Lā'ie-i-ka-wai (In Kū 'Okō'a 1862-1863), records that “Kahoupokane” was one of three companions of Poli'ahu. The other two companions were Lilinoe and Waiau.

The area identified as Ka-houpo-o-Kāne is situated below Waiau, on the southwestern slopes of Mauna Kea, in the land of Ka'ōhe (Figure 2). One of the primary attributes of Kāne are the wai ola (life giving waters), sacred springs and water sources made by Kāne around the islands, to provide for the welfare of the people and the land (cf. Kamakau 1976 and Beckwith 1970). Interestingly, at Ka-houpo-o-Kāne are found the waters of Pōhakuloa, Hopukani, and Waihū (also known by the name “Ka-wai-hū-a-Kāne”).

Kū-ka-hau-'ula – Kū of the red hewed dew or snow: named for a male deity form of the god Kū and lover of Poli'ahu, goddess of the mountain (see the section of traditional narratives in this study). Kūkahau'ula is identified in the Boundary Commission testimonies of 1873 as the highest peak on Mauna Kea (now generally identified as Mauna Kea peak or Pu'u Wekiu) and is recorded by C. Lyons in his 1884 survey the summit peaks of Mauna Kea (cf. Register Map 1210 of 1884; in the collection of the State Survey Division). (Figure 2)

Pōhaku-a-Kāne – May be literally translated as the “Stone made by Kāne.” A traditional Hawaiian account recorded in the early twentieth century tells us that Pōhaku-a-Kāne, also called Ka-paepae-kapu-a-Kāne (the sacred platform of Kāne), was named for a form taken by the god Kāne. A platform near Waiau was named for and dedicated to this deity (see the historical narratives in this study).

Pōhaku-loa – May be literally translated as the “Long Stone.” A traditional account recorded in the early twentieth century tells us that Pōhakuloa was named for a deity who was a guardian of Ka-wai-kapu-a-Kāne (The sacred water of Kāne) at Waiau. The name Pōhakuloa is applied to a land area, gulch, and water source situated on the slopes of Mauna Kea and making up a portion of the saddle between Mauna Kea and Mauna Loa. As a place name, Pōhakuloa can be traced back to a least the Boundary Commission testimonies of native informants in the 1870s (see selected narratives in this study)."

Please include this email as my testimony & response to the Survey.

I request the opportunity for an interview, please call me at 808-990-0529.

I will return to Oahu in November.

.....  
**Mahalo,**  
**Mililani B. Trask**

--

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**From:** Mililani Trask mililani.trask@icllchawaii.com   
**Subject:** Fwd: Pohakuloa Consultation  
**Date:** January 12, 2021 at 10:43 AM  
**To:** community@honuaconsulting.com, Ku Kahakalau kukahakalau@gmail.com



----- Forwarded message -----

**From:** Mililani Trask <[mililani.trask@icllchawaii.com](mailto:mililani.trask@icllchawaii.com)>  
**Date:** Tue, Jan 12, 2021 at 9:24 AM  
**Subject:** Pohakuloa Consultation  
**To:** <[admin@honuaconsulting.com](mailto:admin@honuaconsulting.com)>, Luana Busby <[alakupui@aol.com](mailto:alakupui@aol.com)>, Ku Kahakalau <[kukahakalau@gmail.com](mailto:kukahakalau@gmail.com)>

Aloha Trisha,

Your letter dated December 12, 2020 was received by me on January 11th! It was 1 month late! The Post offices in Hilo & Keaau were backed up for miles last month, and no wonder it never arrived. I immediately called Luana Busby Neff to talk with her about it, she did not receive it either. She did not know or hear about it at all. She is following up with you directly.

Luana, Craig & a few other have been Makahiki practitioners on Pohakuloa for many years.

In my submittal to the U.S. DoD, I state that I was a practitioner on Pohakuloa for years, going there to gather Kuni stones, however when Uncle KU learned about the radiation resulting from US Military testing & the problem with rocks being contaminated & washing down during heavy rains, I had to stop going up and return all the stones because there was no way to insure that the Kuni stones were safe. My sister Keonaona (Damien) came with me during this years. She later was diagnosed with Breast Cancer.

I am sending photos of the letter to Luana today. Please follow up with her directly. She is on this email. Please confirm that you have received these attachments.

I am forwarding herewith the response I sent to the US DoD (Gilda) and the attachments which include my request for copies of all cultural reports done by the US DoD these past years. The DoD has significant data including reports on the location status of cultural features being impacted in Pohakuloa, but refuses to release these data.

XX  
MBT  
Call me  
808-990-0529

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**Milliani Trask** <milliani.trask@icllchawaii.com>

Fri, Nov 6, 2020 at 10:28 AM

To: laura.l.gilda@mail.mil, DoD\_NativeAffairs@koresnm.com

Bcc: Milliani Trask <milliani.trask@icllchawaii.com>, Luana Busby <alakukui@aol.com>, Leilani Lindsey <lkaapuni@gmail.com>, Kyle Kajihira <kyle.kajihira@gmail.com>, Mallia Nobrega <mallianob@gmail.com>, Ku Kahakalau <kukahakalau@gmail.com>

Forwarding attachments including Testimony & Submission to DOD Re: DoD 4710.03 – Re: Consultation Policy of USA with Native Hawaiians, as well as executed forms for continuing Consultation with US DoD on protection of Hawaii Cultural properties & affiliated human rights.

Please confirm receipt.

XX

Milliani B. Trask  
Convener,  
Na Koa Ikaika Kalahul Hawaii

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**3 attachments**

 **DoD-USAGP Training PA Cons Party Status Request2020.pdf**  
332K

 **DoD - 2020GeneralConsultUpdateForm.pdf**  
195K

 **MBT- NaKoa DOD COmments- FNL:PDF.pdf**  
458K



MBT- DOD  
COmm...6.docx

**From:** Mililani Trask mililani.trask@icllchawaii.com   
**Subject:** Fwd: Comments - DoD 4710.03  
**Date:** January 12, 2021 at 3:49 PM  
**To:** community@honuaconsulting.com



Hre is my complete submission to DoD Cnsultation  
XX  
MBT

----- Forwarded message -----  
**From:** Mililani Trask <mililani.trask@icllchawaii.com>  
**Date:** Fri, Nov 6, 2020 at 10:28 AM  
**Subject:** Comments - DoD 4710.03  
**To:** <laura.l.gilda@mail.mil>, <DoD\_NativeAffairs@keresnm.com>

Forwarding attachments including Testimony & Submission to DOD Re: DoD 4710.03 – Re: Consultation Policy of USA with Native Hawaiians, as well as executed forms for continuing Consultation with US DoD on protection of Hawaiiin Cultural properties & affiliated human rights.

Please confirm receipt.

XX  
Mililani B. Trask  
Convener,  
Na Koa Ikaika Kalahui Hawaii

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## United States Army Garrison - Pōhakuloa

### Consulting Party Request Form for Hawaii Island Training Programmatic Agreement

**Name of Person Completing Form:** Milani B. Trask

- I request to be added as a consulting party to the Training PA.
- I am no longer interested in consultation on the development of the Training PA.



Na Koa Ikaika o Ka Lahui Hawaii  
Affiliate of Indigenous World Association  
P.O.Box 6377 ❖ Hilo, HI 96720  
mililani.trask@icllchawaii.com



To: U.S. Dept. of Defense  
[DoD\\_NativeAffairs@keresnm.com](mailto:DoD_NativeAffairs@keresnm.com)

October , 2020

From: Mililani B. Trask, Convenor  
Na Koa Ikaika KaLahui Hawaii  
ECO-SOC Affiliate to Indigenous World Association  
And NHO on U.S. Federal 106 Consultation list.

Re: DoD 4710.03 – Re: Consultation Policy of USA with Native Hawaiians.

**I. *Objections to the manner in which this Consultation is being conducted by the USDOD & Proposed Corrective Measures to address these deficiencies:***

- A. The US DOD is trying to include Native Hawaiians ( hereafter Hawaiians)in its federal policy governing Consultations with Indians, who have federally recognized tribes. Hawaiians are not federally recognized Tribes and so do not have an indigenous governing body to speak for & represent their interests. Because Hawaiians are not federally recognized, the USDOD has tried& is trying, to avoid real Consultations with real Hawaiian cultural practitioners by substituting the Office of Hawaiian Affairs as the Hawaiian peoples representative government, and hosting informal discussions with Hawaiian Social groups who are not cultural practitioners.
- B. This cannot be done. What is required is a Consultation process & procedures with Hawaiians who are cultural practitioners with family & traditional affiliations to Land and Ocean based resources that comprise the Native Hawaiian land trusts, including the Northwest Hawaiian Islands, which trust lands and resources are impacted by DoD activities.

**Recommendations for Procedural Requirements: Published Notice in News Media outlets statewide & mailouts to Hawaiian individuals & NHO's whose members are practitioners and for all NHO's on the 106 list of Interior.**

The USDOD needs to adopt a procedure for providing notice to Hawaiians practitioners of future Consultations at least 60 days prior to the actual Consultation, that requires (at a minimum) detailed information on what the Consultation process is, the topic & scope of the Consultation are as well as the timeframe for submitting written input and comments.

Notice to Hawaiian cultural practitioners should be published in local & Statewide newspapers for 8 consecutive weeks prior to the date of the scheduled consultation. COVID is no excuse for not hosting ZOOM meetings so that Hawaiians can participate directly in Consultations re: USDOD activities in our State, on Ceded as well as DHHL lands and State waters.

OHA is a State Agency elected by the public, Statewide. OHA Trustees are elected primarily by non-Hawaiian voters from Oahu who are not ethnically Hawaiian and who do not “represent” Hawaiians from any State or County Election district. Most importantly. The record indicates that Hawaiians have repeatedly had to sue OHA for accountability and that there have been in recent years at least 3 Audits questioning OHA's use of trust funds, and failure to be transparent and accountable to its Hawaiian beneficiaries. In recent years the State Legislature withheld funding from OHA because of these problems.

**II. The failure of the current process, including the current “Consultation” on DoD 4710.03 is evident in the evolution of this USDOD Policy.**

It is now 2020, the USDOD claims that it has already completed its ‘initial’ “Consultation” with Native Hawaiian practitioners because it held “community” meetings with some Hawaiian Social groups, (Civic Clubs) , OHA, CNHA and others “interested in the impact of DoD operations and efforts to preserve natural and cultural resources and places of traditional religious and cultural significance.” These meetings were held for 2 years, between 2006 and 2008.

(See Report to Congress, Department of Defense Consultation With Native Hawaiians, Sept. 2019).

Three years later, in 2011 DoD entered into an MOU with two other Federal Agencies (Interior & ACHP) called the “ Native Hawaiian Federal Interagency Working Group”. In October, 2011 DoD adopted its own internal policy which it has recently sent out as a “DRAFT” for further input from OHA & Hawaiian Social groups.

DoD never actually adopted any procedure or policy framework for consultations with Native Hawaiian cultural practitioners. In its 2019 Report to Congress, Dod States...” DoD established a separate consultation policy 2011, *Department of Defense Instruction 4710.03: Consultation With Native Hawaiian Organizations* (DoDI 4710.03). DoD remains the only federal agency with a policy specific to consultation with NHOs. “ This is patently false. DoD is now circulating another red lined “Draft” Policy for input.

What is required is a real Consultation, publically Noticed NOW. Instead DOD is trying to use data gathered from Social groups, businesses, a State Agency & “others” 12-14 years ago as input to a Consultation on current cultural uses & practices & related belief systems impacted by current DOD Land & Ocean Activities on EO, State trust lands & resources leased to the US & utilized by the USDOD.

**Recommendation: NaKoa requests that the DOD hold real consultations NOW on the adoption of a DOD policy framework & procedures for DOD Consultation with Native Hawaiians Hawaiians that includes but is not limited to NHO's on the 106 list as well as others who respond to the published notice which has yet to be undertaken.**

A. Current efforts of DoD to hold secret “off the record” discussions with Hawaiian practitioners using Pohakuloa, in KAOHE, Hawaii Island:

Recently, DOD acting with the support of the Chamber of Commerce held quiet ZOOM meetings with a few Hawaiians in secret. The contractor hired was Noe Kalipi (Kalipi Enterprises). Hawaiians involved (about 7 people) were not even told what the ZOOM was about or who would be on the ZOOM. It turned out it was a USDOD “Consultation” being paid for by the Chamber of Commerce! Military personal including several Generals & the topic was renewal of the DOD leases in Pohakuloa!!

After weeks, it went nowhere, two months later, this USDOD notice came out in the OHA Newsletter. Outer islands saw it in mid-October when the newspapers are sent out, leaving only 3 weeks to respond. However, the USDOD posting of data referred to in the OHA newspaper could not be accessed on line as represented.

B. Misrepresentation of U.S. to United Nations on Consultation with Native Hawaiians:

On April 26, 2019 Valerie Houser, Advisor to the US Mission to the U.N. delivered a false statement to the US Permanent Forum representing that US Agencies had a functioning policy for consulting with Native Hawaiians when federal “projects” protection of Hawaiian and Indian affect Hawaiian “properties” Hawaiians view as religious or culturally significant. In her Statement Houser only mentions the NHPA, ACHP, the ARPA and NEPA – the USDOD WAS EXCLUDE BECAUSE THERE IS NO POLICY OR PROCEDURE IN PLACE FOR Consultation with real Hawaiian cultural and religious practitioners.

**III. Request for DoD disclosure of all relevant current & historic data, including archeological, cultural, & scientific reports relating to all US DoD uses & the impacts of such uses to Native Hawaiian trust lands & oceanic resources & assets.**

**A. Na Koa Ikaika KaLahui Hawaii requests copies of the following Reports & studies, including appendixes, attachments including cultural mapping diagrams in order to facilitate its review of the impact of DoD uses of Native Hawaiian trust lands and oceanic resources & areas...**

Beavers, Andrew M., and Robert E. Burgan. 2002. "Analysis of Fire History and Management Concerns at Pohakuloa Training Area." CEMML TPS 02-02. Center for Environmental Management of Military Lands.

"Final Report Ecosystem Management Program Cultural Resources Inventory Survey of Previously Unsurveyed Areas, Redleg Trail Vicinity, U.S. Army." 2002. DACA83-95-D-0006, Task Order 0030 and 0031. U.S. Army Corps of Engineers.

Roberts, Alice K.S. 2002. "Archaeological Reconnaissance of 1,010 Acres of Pu'u Ke'eke'e Lands, U.S. Army Pohakuloa Training Area (PTA), Island of Hawaii, Hawaii." DACA83-01-D-0013, Task Order No. 0008. U.S. Army Corps of Engineers.

Williams, Scott S. 2002. "Final Report Archaeological Reconnaissance Survey U.S. Army Pohakuloa Training Area (PTA) for the U.S. Army Garrison, Hawaii, Ecosystem Management Program, Hawai'i Island, Hawai'i." U.S. Army Corps of Engineers.

Garcia and Associates. 2010. "Final Archaeological and Cultural Monitoring of Construction of Battle Area Complex (BAX) for Stryker Brigade Combat Team (SBCT), Pōhakuloa Training Area, Hawai'i Island, Hawai'i." DACA83-03-D-0011, Task Order No. 0016. U.S. Army Corps of Engineers.

Monahan, Christopher M., and SWCA Environmental Consultants. 2009. "Cultural Resource Evaluations of Stryker Transformation Areas in Hawai'i." Office of Hawaiian Affairs and U.S. Army.

Monahan, Christopher M., Sarah Wilkinson, and Momi Wheeler. 2013. "FINAL Archaeological Phase II Crater Investigation, U.S. Army Pōhakuloa Training Area, Island of Hawai'i, Hawai'i: A Functional and Temporal Interpretation of Excavated Pits in the Mauna 'Āina and Their Significance in Hawaiian Prehistory." W9128A-08-D-0009, Task Order No. 0012. U.S. Army Corps of Engineers.

Taomia, Julie M E, James A Head, Kelly Leialoha Luscomb, and J Cary Stine. 2008. "Cultural Resources Management Projects Performed at the Pohakuloa Training Area, Island of Hawai'i, Hawai'i," 178.

Thurman, Douglas, Katie M. Sprouse, Christopher Manahan, and David Shidleler. 2013. "Final Archaeological Reconnaissance Survey Report of Infantry Platoon Battle Area, U.S. Army Pōhakuloa Training Area (PTA), Ka'ōhe Mauka Ahupua'a, Hāmākua District." W9128A-08-D-0009. U.S. Army Corps of Engineers.

Wheeler, Momi, Sarah Wilkinson, and Hallett H. Hammatt. 2014. "Archaeological and Cultural Monitoring Report for the Stryker Brigade Combat Team (SBCT) Construction-Related Activities along the Loop Trail, Main Supply Route, and Ke'eke'e Road, Ke'āmuku Maneuver Area (KMA), U.S. Army Pōhakuloa Training Area (PTA), Island of Hawai'i, Hawai'i." W9128A-08-D-0009, Task Order No. 0019. U.S. Army Corps of Engineers.

Wilkinson, Sarah, Momi Wheeler, Auli'i Mitchell, and Christopher M. Monahan. 2014. "Archaeological and Cultural Monitoring Report for Activities Related to Construction of the Proposed Battle Area Complex (BAX) for the Stryker Brigade Combat Team (SBCT), U.S. Army Pōhakuloa Training Area (PTA), Island of Hawai'i, Hawai'i, TMK: (3) 4-4-016:005." U.S. Army Corps of Engineers.

HHF Planners. 2020. "Real Property Master Plan Pohakuloa Training Area, Hawai'i Island - Final" Full Report.

Institute for Sustainable Development, and Belt Collins Hawai'i. n.d. "Environmental Assessment (EA) for Marine Corps Amphibious Training in Hawaii." Contract Number N62742-94-D-0006, Delivery Order 22.

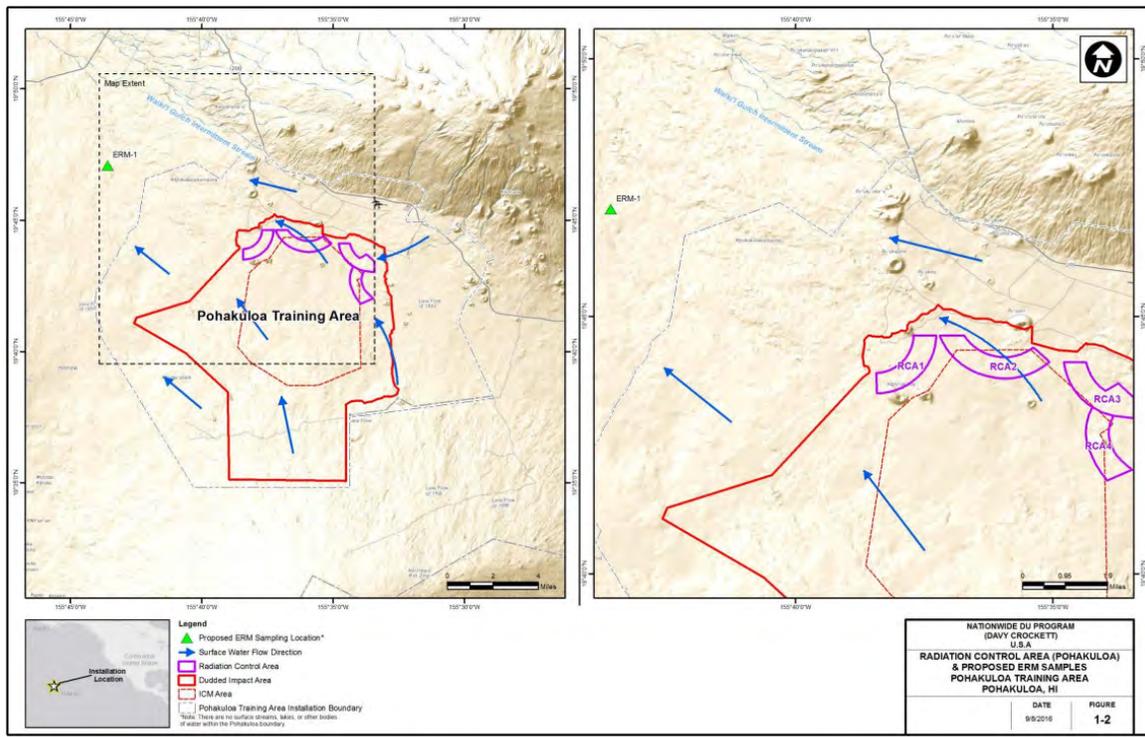
James Kent Associates, and Institute for Sustainable Development. 1998. "Decision Support Document: Community Resources Summary and Recommendations Marine Corps Amphibious Training at Makua Beach." Kane'ōhe, Hawai'i: Marine Corps Base Hawaii.

James Kent Associates, and Institute for Sustainable Development. 1999. "Three Reports Related to the Makua Beach Amphibious Training of the U.S. Marine Corps, Support Documents for the Environmental Impact Statement." Kane'ōhe, Hawai'i: Environmental Department, Marine Corps Base Hawaii.

Maly, Kepā, and Institute for Sustainable Development. 1998. "Oral History Study: Ahupua'a of Mākua and Kahanahāiki, District of Wai'anae, Island of O'ahu." BCH Project No. 442.0122. N62742-94-D-0006 D.O. 22. U.S. Navy, PACDIV.

Maly, Kepā.; Rechtman, Robert B., 1961-; Rosendahl, Paul H. (Paul Harmer). 1997. "Guidance for the preparation of a community caretaker/partnership plan for cultural resources stewardship at Marine Corps Base Hawaii (MCBH) Mōkapu Peninsula, Hawaii : lands of He'ēia and Kāne'ōhe, Ko'olau Poko District, Island of O'ahu." Marine Corps Base Hawaii.

**B. NaKoa requests that DoD provide a current Report on the status of the Pohakuloa Radiation Monitoring Plan that was finalized in December 2016.** This U.S. Army plan was produced as a condition to a Nuclear Regulatory Commission license for the possession of depleted uranium, used at the facility decades ago. This site-specific Plan was finalized for the Pohakuloa Training Area. The DU spotting rounds and fragments were scattered at PTA as a result of the use of the 1960s-era Davy Crockett weapons system. The plan was to identify potential routes for DU transport and describe the monitoring approach to detect any off-installation migration.



This map of Pohakuloa, found in the plan, shows the radiation control areas in purple. The green triangle is the proposed Radiation Monitoring sample location. Co-located surface water and sediment samples will be gathered, the Army says. The blue arrows indicate the direction of surface water flow, according to the Army.

Na Koa is seeking DoD data on groundwater samples at PTA, as well as the results of the quarterly testing the Army agreed to conduct in 2016 when they were forced to admit to the past use of Davy Crockett weapons system at PTA. These data are critical to the health & safety of Hawaiian cultural practitioners who use the area for gathering or worship.

C. NaKoa has obtained a copy of the FINAL // UNCLASSIFIED PROGRAMMATIC AGREEMENT AMONG THE U.S. ARMY GARRISON, PŌHAKULOA TRAINING AREA, THE U.S. ARMY GARRISON, HAWAII, THE HAWAII STATE HISTORIC PRESERVATION OFFICER, AND THE ADVISORY COUNCIL ON HISTORIC PRESERVATION REGARDING ROUTINE MILITARY TRAINING ACTIONS AND RELATED ACTIVITIES AT UNITED STATES ARMY INSTALLATIONS ON THE ISLAND OF HAWAII, HAWAII dated 25 September 2018.

**It states, in part...**

**“WHEREAS, as of the signing of this PA, identification of potential historic properties through intensive pedestrian archaeological surveys have been conducted on approximately 45% of the accessible land (approximately 81,000 acres outside of the high hazard Impact Area) at PTA (Appendix B); and....**

**WHEREAS, as of the signing of this PA, approximately 31% of the identified archaeological type properties at PTA have been evaluated for NRHP eligibility. The remaining 69% of known archaeological properties distributed across the accessible land are treated as eligible for the NRHP and adverse effects avoided in accordance with AR 200-1 Part 6-4(b)(9); and**

**WHEREAS, the targeted high-hazard impact area at PTA has been used for high- explosive and incendiary munitions training since the mid-20th century and will continue to be used in this manner; and**

**WHEREAS, the danger of unexploded ordnance in the targeted high-hazard impact area (Appendix A) precludes pedestrian survey for historic property identification and evaluation efforts in that area; and**

**WHEREAS, the USAG-Pōhakuloa has determined that previous military training and related activities have had adverse effects on historic properties in the APE, and that some undertakings may continue to have adverse effects on historic properties in the APE; ....”**

Following these representations, the PA includes several pages of “Stipulations” and agreements between the State & DoD. Na Koa requests that DoD address in writing, the progress made in implementation of the Stipulations.

For Example: At the time the PA was signed only 31 percent of archaeological properties had been evaluated for NRHP eligibility, have the remaining 69 percent been evaluated. What is the status on the protection of these properties today?

D. NaKoa is concerned that some of the procedures & processes being implemented in the PA of 25 September 2018 are not in conformity with State law regarding the treatment of burials, including traditional burials. For example **Appendix G - Post-Review Discoveries currently allows the US DoD to assess, remove & dispose of Native Hawaiian human remains and related artifacts, after implementing their internal procedure. This would occur without posting 'public notice' notice of the find and location for in a public and native Hawaiians who may have a family or cultural affiliation with the burial. Under the current DoD procedure, no effort is made to conform to our State burial laws, or to identify and include lineal descendants when DoD activities disturb traditional burial areas.**

#### CONCLUSION:

The US is a signatory to the UNDRIP which sets minimum standards for protection of the rights on indigenous peoples, whether or not they are recognized by States. NaKoa suggests that the US DoD utilize the standards contained in the UNDRIP to address their obligations to Native Hawaiians and that the US DoD create a procedure to facilitate working with Hawaiians with cultural & ohana ties to the trust lands & resources impacted by USDoD activities.

Upon receipt & review of the materials requested, NaKoa will respond in more detail to the DoD draft policy (red-lined) that was forwarded with the materials.

Dated: November 6<sup>th</sup>, 2020,

Mililani B. Trask  
Na Koa Ikaika KaLahui Hawaii

**Organization Name:** Na KOa Ikaika KaLahui Hawaii  
(if applicable): \_\_\_\_\_

Native Hawaiian Organization serving and representing interests of Native Hawaiians, providing services to Native Hawaiians, and with expertise in aspects of historic preservation significant to Native Hawaiians.

Other relationship to undertaking or concern with effects to historic properties.  
Please briefly describe:

ECO-SOC affiliate to Indigenous World credential at UN

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### Contact information

Please take this opportunity to update the contact information on file. If no change is necessary, this section can be left blank.

**Organizational Contact Name if different from above:** Na KOa Ikaika KaLahui Hawaii

**Mailing Address (Street, City, State, Zip Code):** PO BX 6377m Hilo HI 96720

**Email Address:** mililani.trask@iclichawaii.com **Phone Number:** 10808-90-0529

Please submit this form via email to Mr. Richard Davis, USAG-HI Cultural Resources Manager, at [usarmy.hawaii.crm@mail.mil](mailto:usarmy.hawaii.crm@mail.mil) or by U.S. Postal mail to: Department of the Army, United States Army Garrison, Pohakuloa, DPW Environmental – Cultural Resources Section, P.O. Box 4607, Hilo, Hawaii 96720. Please contact Dr. Taomia at (808) 436-4280 if you have any questions.



DoD -  
2020G...rm.pdf



MBT- NaKoa  
DOD C...DF.pdf



**Na Koa Ikaika o Ka Lahui Hawaii**  
**Affiliate of Indigenous World Association**  
**P.O.Box 6377 ❖ Hilo, HI 96720**  
**mililani.trask@icllchawaii.com**



To: U.S. Dept. of Defense  
[DoD\\_NativeAffairs@keresnm.com](mailto:DoD_NativeAffairs@keresnm.com)

October , 2020

From: Mililani B. Trask, Convenor  
Na Koa Ikaika KaLahui Hawaii  
ECO-SOC Affiliate to Indigenous World Association  
And NHO on U.S. Federal 106 Consultation list.

Re: DoD 4710.03 – Re: Consultation Policy of USA with Native Hawaiians.

**I. *Objections to the manner in which this Consultation is being conducted by the USDOD & Proposed Corrective Measures to address these deficiencies:***

- A.** The US DOD is trying to include Native Hawaiians ( hereafter Hawaiians)in its federal policy governing Consultations with Indians, who have federally recognized tribes. Hawaiians are not federally recognized Tribes and so do not have an indigenous governing body to speak for & represent their interests. Because Hawaiians are not federally recognized, the USDOD has tried& is trying, to avoid real Consultations with real Hawaiian cultural practitioners by substituting the Office of Hawaiian Affairs as the Hawaiian peoples representative government, and hosting informal discussions with Hawaiian Social groups who are not cultural practitioners.
- B.** This cannot be done. What is required is a Consultation process & procedures with Hawaiians who are cultural practitioners with family & traditional affiliations to Land and Ocean based resources that comprise the Native Hawaiian land trusts, including the Northwest Hawaiian Islands, which trust lands and resources are impacted by DoD activities.

**Recommendations for Procedural Requirements: Published Notice in News Media outlets statewide & mailouts to Hawaiian individuals & NHO's whose members are practitioners and for all NHO's on the 106 list of Interior.**

The USDOD needs to adopt a procedure for providing notice to Hawaiians practitioners of future Consultations at least 60 days prior to the actual Consultation, that requires (at a minimum) detailed information on what the Consultation process is, the topic & scope of the Consultation are as well as the timeframe for submitting written input and comments.

Notice to Hawaiian cultural practitioners should be published in local & Statewide newspapers for 8 consecutive weeks prior to the date of the scheduled consultation. COVID is no excuse for not hosting ZOOM meetings so that Hawaiians can participate directly in Consultations re: USDOD activities in our State, on Ceded as well as DHHL lands and State waters.

OHA is a State Agency elected by the public, Statewide. OHA Trustees are elected primarily by non-Hawaiian voters from Oahu who are not ethnically Hawaiian and who do not “represent” Hawaiians from any State or County Election district. Most importantly. The record indicates that Hawaiians have repeatedly had to sue OHA for accountability and that there have been in recent years at least 3 Audits questioning OHA’s use of trust funds, and failure to be transparent and accountable to its Hawaiian beneficiaries. In recent years the State Legislature withheld funding from OHA because of these problems.

**II. The failure of the current process, including the current “Consultation” on DoD 4710.03 is evident in the evolution of this USDOD Policy.**

It is now 2020, the USDOD claims that it has already completed its ‘initial’ “Consultation” with Native Hawaiian practitioners because it held “community” meetings with some Hawaiian Social groups, (Civic Clubs) , OHA, CNHA and others “interested in the impact of DoD operations and efforts to preserve natural and cultural resources and places of traditional religious and cultural significance.” These meetings were held for 2 years, between 2006 and 2008.

(See Report to Congress, Department of Defense Consultation With Native Hawaiians, Sept. 2019).

Three years later, in 2011 DoD entered into an MOU with two other Federal Agencies (Interior & ACHP) called the “ Native Hawaiian Federal Interagency Working Group”. In October, 2011 DoD adopted its own internal policy which it has recently sent out as a “DRAFT” for further input from OHA & Hawaiian Social groups.

DoD never actually adopted any procedure or policy framework for consultations with Native Hawaiian cultural practitioners. In its 2019 Report to Congress, Dod States...” DoD established a separate consultation policy 2011, *Department of Defense Instruction 4710.03: Consultation With Native Hawaiian Organizations* (DoDI 4710.03). DoD remains the only federal agency with a policy specific to consultation with NHOs. “ This is patently false. DoD is now circulating another red lined “Draft” Policy for input.

What is required is a real Consultation, publically Noticed NOW. Instead DOD is trying to use data gathered from Social groups, businesses, a State Agency & "others" 12-14 years ago as input to a Consultation on current cultural uses & practices & related belief systems impacted by current DOD Land & Ocean Activities on EO, State trust lands & resources leased to the US & utilized by the USDOD.

**Recommendation: NaKoa requests that the DOD hold real consultations NOW on the adoption of a DOD policy framework & procedures for DOD Consultation with Native Hawaiians Hawaiians that includes but is not limited to NHO's on the 106 list as well as others who respond to the published notice which has yet to be undertaken.**

A. Current efforts of DoD to hold secret "off the record" discussions with Hawaiian practitioners using Pohakuloa, in KAOHE, Hawaii Island:

Recently, DOD acting with the support of the Chamber of Commerce held quiet ZOOM meetings with a few Hawaiians in secret. The contractor hired was Noe Kalipi (Kalipi Enterprises). Hawaiians involved (about 7 people) were not even told what the ZOOM was about or who would be on the ZOOM. It turned out it was a USDOD "Consultation" being paid for by the Chamber of Commerce! Military personal including several Generals & the topic was renewal of the DOD leases in Pohakuloa!!

After weeks, it went nowhere, two months later, this USDOD notice came out in the OHA Newsletter. Outer islands saw it in mid-October when the newspapers are sent out, leaving only 3 weeks to respond. However, the USDOD posting of data referred to in the OHA newspaper could not be accessed on line as represented.

B. Misrepresentation of U.S. to United Nations on Consultation with Native Hawaiians:

On April 26, 2019 Valerie Houser, Advisor to the US Mission to the U.N. delivered a false statement to the US Permanent Forum representing that US Agencies had a functioning policy for consulting with Native Hawaiians when federal "projects" protection of Hawaiian and Indian affect Hawaiian "properties" Hawaiians view as religious or culturally significant. In her Statement Houser only mentions the NHPA, ACHP, the ARPA and NEPA – the USDOD WAS EXCLUDE BECAUSE THERE IS NO POLICY OR PROCEDURE IN PLACE FOR Consultation with real Hawaiian cultural and religious practitioners.

**III. Request for DoD disclosure of all relevant current & historic data, including archeological, cultural, & scientific reports relating to all US DoD uses & the impacts of such uses to Native Hawaiian trust lands & oceanic resources & assets.**

**A. Na Koa Ikaika KaLahui Hawaii requests copies of the following Reports & studies, including appendixes, attachments including cultural mapping diagrams in order to facilitate its review of the impact of DoD uses of Native Hawaiian trust lands and oceanic resources & areas...**

Beavers, Andrew M., and Robert E. Burgan. 2002. "Analysis of Fire History and Management Concerns at Pohakuloa Training Area." CEMML TPS 02-02. Center for Environmental Management of Military Lands.

"Final Report Ecosystem Management Program Cultural Resources Inventory Survey of Previously Unsurveyed Areas, Redleg Trail Vicinity, U.S. Army." 2002. DACA83-95-D-0006, Task Order 0030 and 0031. U.S. Army Corps of Engineers.

Roberts, Alice K.S. 2002. "Archaeological Reconnaissance of 1,010 Acres of Pu'u Ke'eke'e Lands, U.S. Army Pohakuloa Training Area (PTA), Island of Hawaii, Hawaii." DACA83-01-D-0013, Task Order No. 0008. U.S. Army Corps of Engineers.

Williams, Scott S. 2002. "Final Report Archaeological Reconnaissance Survey U.S. Army Pohakuloa Training Area (PTA) for the U.S. Army Garrison, Hawaii, Ecosystem Management Program, Hawai'i Island, Hawai'i." U.S. Army Corps of Engineers.

Garcia and Associates. 2010. "Final Archaeological and Cultural Monitoring of Construction of Battle Area Complex (BAX) for Stryker Brigade Combat Team (SBCT), Pōhakuloa Training Area, Hawai'i Island, Hawai'i." DACA83-03-D-0011, Task Order No. 0016. U.S. Army Corps of Engineers.

Monahan, Christopher M., and SWCA Environmental Consultants. 2009. "Cultural Resource Evaluations of Stryker Transformation Areas in Hawai'i." Office of Hawaiian Affairs and U.S. Army.

Monahan, Christopher M., Sarah Wilkinson, and Momi Wheeler. 2013. "FINAL Archaeological Phase II Crater Investigation, U.S. Army Pōhakuloa Training Area, Island of Hawai'i, Hawai'i: A Functional and Temporal Interpretation of Excavated Pits in the Mauna 'Āina and Their Significance in Hawaiian Prehistory." W9128A-08-D-0009, Task Order No. 0012. U.S. Army Corps of Engineers.

Taomia, Julie M E, James A Head, Kelly Leialoha Luscomb, and J Cary Stine. 2008. "Cultural Resources Management Projects Performed at the Pohakuloa Training Area, Island of Hawai'i, Hawai'i," 178.

Thurman, Douglas, Katie M. Sprouse, Christopher Manahan, and Davidf Shidleler. 2013. "Final Archaeological Reconnaissance Survey Report of Infantry Platoon Battle Area, U.S. Army Pōhakuloa Training Area (PTA), Ka'ohē Mauka Ahupua'a, Hāmākua Dstrict." W9128A-08-D-0009. U.S. Army Corps of Engineers.

Wheeler, Momi, Sarah Wilkinson, and Hallett H. Hammatt. 2014. "Archaeological and Cultural Monitoring Report for the Stryker Brigade Combat Team (SBCT) Construction-Related Activities along the Loop Trail, Main Supply Route, and Ke'eke'e Road, Ke'āmuku Maneuver Area (KMA), U.S. Army Pōhakuloa Training Area (PTA), Island of Hawai'i, Hawai'i." W9128A-08-D-0009, Task Order No. 0019. U.S. Army Corps of Engineers.

Wilkinson, Sarah, Momi Wheeler, Auli'i Mitchell, and Christopher M. Monahan. 2014. "Archaeological and Cultural Monitoring Report for Activities Related to Construction of the Proposed Battle Area Complex (BAX) for the Stryker Brigade Combat Team (SBCT), U.S. Army Pōhakuloa Training Area (PTA), Island of Hawai'i, Hawai'i, TMK: (3) 4-4-016:005." U.S. Army Corps of Engineers.

HHF Planners. 2020. "Real Property Master Plan Pohakuloa Training Area, Hawai'i Island - Final" Full Report.

Institute for Sustainable Development, and Belt Collins Hawai'i. n.d. "Environmental Assessment (EA) for Marine Corps Amphibious Training in Hawaii." Contract Number N62742-94-D-0006, Delivery Order 22.

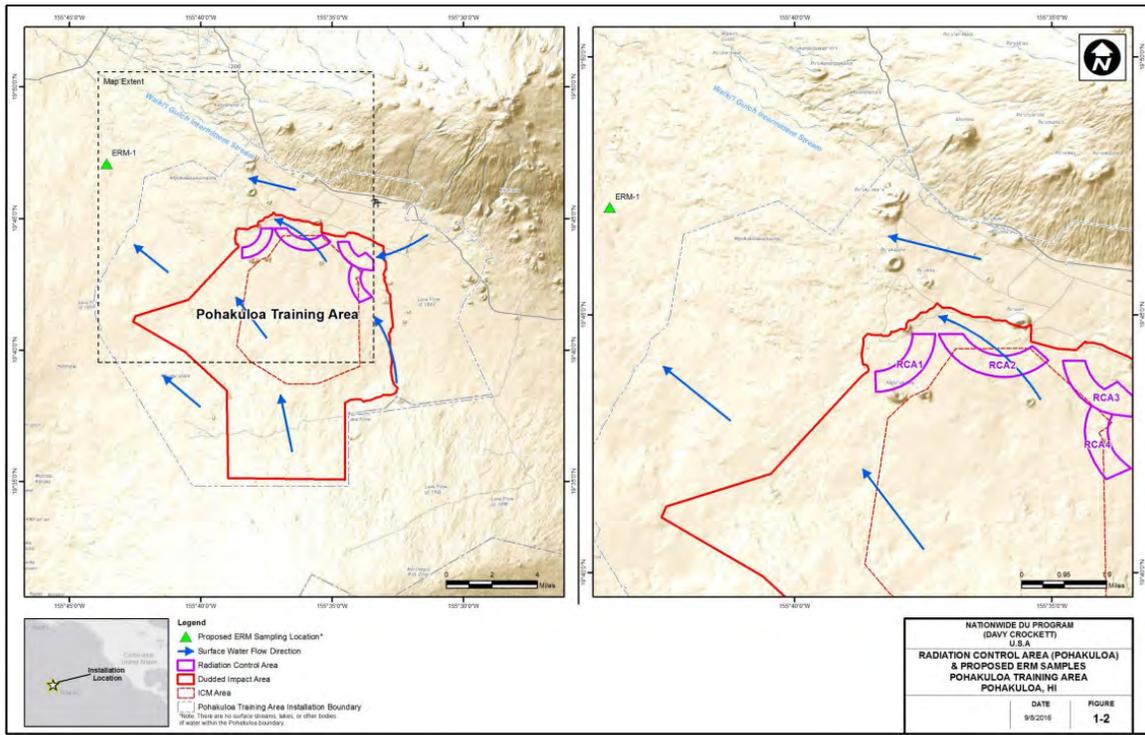
James Kent Associates, and Institute for Sustainable Development. 1998. "Decision Support Document: Community Resources Summary and Recommendations Marine Corps Amphibious Training at Makua Beach." Kane'ohē, Hawai'i: Marine Corps Base Hawaii.

James Kent Associates, and Institute for Sustainable Development. 1999. "Three Reports Related to the Makua Beach Amphibious Training of the U.S. Marine Corps, Support Documents for the Environmental Impact Statement." Kane'ohē, Hawai'i: Environmental Department, Marine Corps Base Hawaii.

Maly, Kepā, and Institute for Sustainable Development. 1998. "Oral History Study: Ahupua'a of Mākua and Kahanahāiki, District of Wai'anae, Island of O'ahu." BCH Project No. 442.0122. N62742-94-D-0006 D.O. 22. U.S. Navy, PACDIV.

Maly, Kepā.; Rechtman, Robert B., 1961-; Rosendahl, Paul H. (Paul Harmer). 1997. "Guidance for the preparation of a community caretaker/partnership plan for cultural resources stewardship at Marine Corps Base Hawaii (MCBH) Mōkapu Peninsula, Hawaii : lands of He'eia and Kāne'ohē, Ko'olau Poko District, Island of O'ahu." Marine Corps Base Hawaii.

**B. NaKoa requests that DoD provide a current Report on the status of the Pohakuloa Radiation Monitoring Plan that was finalized in December 2016.** This U.S. Army plan was produced as a condition to a Nuclear Regulatory Commission license for the possession of depleted uranium, used at the facility decades ago. This site-specific Plan was finalized for the Pohakuloa Training Area. The DU spotting rounds and fragments were scattered at PTA as a result of the use of the 1960s-era Davy Crockett weapons system. The plan was to identify potential routes for DU transport and describe the monitoring approach to detect any off-installation migration.



This map of Pohakuloa, found in the plan, shows the radiation control areas in purple. The green triangle is the proposed Radiation Monitoring sample location. Co-located surface water and sediment samples will be gathered, the Army says. The blue arrows indicate the direction of surface water flow, according to the Army.

Na Koa is seeking DoD data on groundwater samples at PTA, as well as the results of the quarterly testing the Army agreed to conduct in 2016 when they were forced to admit to the past use of Davy Crockett weapons system at PTA. These data are critical to the health & safety of Hawaiian cultural practitioners who use the area for gathering or worship.

C. NaKoa has obtained a copy of the FINAL // UNCLASSIFIED PROGRAMMATIC AGREEMENT AMONG THE U.S. ARMY GARRISON, PŌHAKULOA TRAINING AREA, THE U.S. ARMY GARRISON, HAWAII, THE HAWAII STATE HISTORIC PRESERVATION OFFICER, AND THE ADVISORY COUNCIL ON HISTORIC PRESERVATION REGARDING ROUTINE MILITARY TRAINING ACTIONS AND RELATED ACTIVITIES AT UNITED STATES ARMY INSTALLATIONS ON THE ISLAND OF HAWAI'I, HAWAI'I dated 25 September 2018.

**It states, in part...**

**“WHEREAS, as of the signing of this PA, identification of potential historic properties through intensive pedestrian archaeological surveys have been conducted on approximately 45% of the accessible land (approximately 81,000 acres outside of the high hazard Impact Area) at PTA (Appendix B); and....**

**WHEREAS, as of the signing of this PA, approximately 31% of the identified archaeological type properties at PTA have been evaluated for NRHP eligibility. The remaining 69% of known archaeological properties distributed across the accessible land are treated as eligible for the NRHP and adverse effects avoided in accordance with AR 200-1 Part 6-4(b)(9); and**

**WHEREAS, the targeted high-hazard impact area at PTA has been used for high- explosive and incendiary munitions training since the mid-20th century and will continue to be used in this manner; and**

**WHEREAS, the danger of unexploded ordnance in the targeted high-hazard impact area (Appendix A) precludes pedestrian survey for historic property identification and evaluation efforts in that area; and**

**WHEREAS, the USAG-Pōhakuloa has determined that previous military training and related activities have had adverse effects on historic properties in the APE, and that some undertakings may continue to have adverse effects on historic properties in the APE; ....”**

Following these representations, the PA includes several pages of “Stipulations” and agreements between the State & DoD. Na Koa requests that DoD address in writing, the progress made in implementation of the Stipulations.

For Example: At the time the PA was signed only 31 percent of archaeological properties had been evaluated for NRHP eligibility, have the remaining 69 percent been evaluated. What is the status on the protection of these properties today?

D. NaKoa is concerned that some of the procedures & processes being implemented in the PA of 25 September 2018 are not in conformity with State law regarding the treatment of burials, including traditional burials. For example **Appendix G - Post-Review Discoveries** currently allows the US DoD to assess, remove & dispose of Native Hawaiian human remains and related artifacts, after implementing their internal procedure. This would occur without posting 'public notice' notice of the find and location for in a public and native Hawaiians who may have a family or cultural affiliation with the burial. Under the current DoD procedure, no effort is made to conform to our State burial laws, or to identify and include lineal descendants when DoD activities disturb traditional burial areas.

#### CONCLUSION:

The US is a signatory to the UNDRIP which sets minimum standards for protection of the rights on indigenous peoples, whether or not they are recognized by States. NaKoa suggests that the US DoD utilize the standards contained in the UNDRIP to address their obligations to Native Hawaiians and that the US DoD create a procedure to facilitate working with Hawaiians with cultural & ohana ties to the trust lands & resources impacted by USDoD activities.

Upon receipt & review of the materials requested, NaKoa will respond in more detail to the DoD draft policy (red-lined) that was forwarded with the materials.

Dated: November 6<sup>th</sup>, 2020,

Mililani B. Trask  
Na Koa Ikaika KaLahui Hawaii

## United States Army Garrison Hawaii Consultation Request Form

<b>Organization Name (if applicable):</b> Na Koa Ikaika KaLahui Hawaii	
* Native Hawaiian Organization? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No ** Other? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<b>Primary Contact Name:</b> Mililani B. Trask Convener, NaKoalkaika KaLahui Hawaii	<b>Mailing Address (Street, City, State, Zip Code):</b> PO BX 6377, Hilo Hawaii 96 720
<b>Phone Number:</b> 1-808-990-0529	<b>Email Address:</b> mililani.trask@icllchawaii.com

\* A Native Hawaiian Organization is any organization which serves and represents the interests of Native Hawaiians; has a primary stated purpose of providing services to Native Hawaiians; and has demonstrated expertise in aspects of historic preservation that are significant to Native Hawaiians.

\*\*Other individuals and organizations with a demonstrated interest in the project may participate in Section 106 review as consulting parties "due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties." Their participation is subject to approval by the responsible federal agency.

I / We would like to participate in National Historic Preservation Act (NHPA) Section 106 Consultation with the U.S. Army Garrison Hawaii regarding (check all that apply):

- Architectural concerns including historic buildings, structures, and districts
- Archaeological concerns including sites, districts, and places of traditional, religious and cultural significance

I am / We are no longer interested in participating in consultation and wish to be removed from the Army's consultation list.

I / We have no updates for the Army's consultation list.

Help conserve paper and resources, please opt in to receive all consultation correspondence by email. If at any time you prefer a paper copy please let us know.

## United States Army Garrison Hawaii Consultation Request Form

Please check all areas of interest:

### Hawai'i Island

<input checked="" type="checkbox"/>	<b>Kawaihae Military Reservation</b> Moku: South Kohala Ahupua'a: Kawaihae 1st	<input checked="" type="checkbox"/>	<b>Kilauea Military Camp</b> Moku: Ka'u Ahupua'a: Keauhou
<input checked="" type="checkbox"/>	<b>Pōhakuloa Training Area</b> Moku: Hāmākua, South Kohala, North Kona, North Hilo Ahupua'a: Ka'ohe, Waikoloa, Pu'u Anahulu, Humu'ula		

### O'ahu Island

<input checked="" type="checkbox"/>	<b>Aliamanu Military Reservation</b> Moku: Kona Ahupua'a: Moanalua, Hālawā	<input checked="" type="checkbox"/>	<b>Makua Military Reservation</b> Moku: Wai'anae Ahupua'a: Mākua, Kahanahāiki
<input checked="" type="checkbox"/>	<b>Dillingham Military Reservation/ Mokule'ia Army Beach</b> Moku: Waialua Ahupua'a: Keālia, Kawaihāpai, Mokulē'ia, Ka'ena	<input checked="" type="checkbox"/>	<b>Mauna Kapu Communication Station</b> Moku: Wai'anae, 'Ewa Ahupua'a: Nānākuli, Honouliuli
<input checked="" type="checkbox"/>	<b>Field Station Kunia</b> Moku: 'Ewa Ahupua'a: Waikele	<input checked="" type="checkbox"/>	<b>Pilila'au Army Recreational Center</b> Moku: Wai'anae Ahupua'a: Wai'anae Kai
<input checked="" type="checkbox"/>	<b>Fort DeRussy</b> Moku: Kona Ahupua'a: Waikīkī	<input checked="" type="checkbox"/>	<b>Pūpūkea-Pa'ala'a Uka- Drum Road</b> Moku: Waialua, Ko'olauloa Ahupua'a: Kahuku, Kapaeloa, Kaunala, Kawailoa, Lauhulu, Paumalū, Pa'ala'a, Punanue, Waimea, 'Ōi'o
<input checked="" type="checkbox"/>	<b>Fort Shafter</b> Moku: Kona Ahupua'a: Kahauiki	<input checked="" type="checkbox"/>	<b>Schofield Barracks East, West, South Ranges &amp; Cantonment Area</b> Moku: Wai'anae, 'Ewa Ahupua'a: Wai'anae Uka, Honouliuli
<input checked="" type="checkbox"/>	<b>Helemano Military Reservation</b> Moku: Waialua Ahupua'a: Pa'ala'a	<input checked="" type="checkbox"/>	<b>Tripler Army Medical Center</b> Moku: Kona Ahupua'a: Moanalua
<input checked="" type="checkbox"/>	<b>Kahuku Training Area</b> Moku: Ko'olauloa Ahupua'a: Paumalū, Kaunala, Waiale'e, 'Ōpana, Kawela, Hanaka'oe, 'Ōi'o, Kahuku, Mālaekahana, Ulupehupehu, Pahipahiālua, Kahuku, Keana	<input checked="" type="checkbox"/>	<b>Waikakalaua Ammunition Storage Site</b> Moku: 'Ewa Ahupua'a: Waikele
<input checked="" type="checkbox"/>	<b>Kawailoa Training Area</b> Moku: Waialua Ahupua'a: Pa'ala'a, Kawailoa, Lauhulu, Kuikuiloloa, Punanue, Kapaeloa, Kamananui		<b>Wheeler Army Airfield</b> Moku: Wai'anae, 'Ewa Ahupua'a: Wai'anae Uka, Waikele
<input checked="" type="checkbox"/>	<b>Kipapa Ammunition Storage Site</b> Moku: 'Ewa Ahupua'a: Waipi'o		

Please submit this form via email to Mr. Richard D. Davis, Cultural Resources Manager, at [usarmy.hawaii.crmp@mail.mil](mailto:usarmy.hawaii.crmp@mail.mil) or by U.S. Postal mail to: Department of the Army, United States Army Garrison, Hawaii, DPW Environmental – Cultural Resources Section, 948 Santos Dumont Ave. Bldg 105, Wheeler Army Airfield, Schofield Barracks, Hawai'i 96857-5013. Contact Mr. Davis at (808) 655- 9709 if you have any questions.

# United States Army Garrison - Pōhakuloa

## Consulting Party Request Form for Hawaii Island Training Programmatic Agreement

Name of Person Completing Form: Mililani B. Trask

- I request to be added as a consulting party to the Training PA.
- I am no longer interested in consultation on the development of the Training PA.

Organization Name: Na KOa Ikaika KaLahui Hawaii  
(if applicable):

- Native Hawaiian Organization serving and representing interests of Native Hawaiians, providing services to Native Hawaiians, and with expertise in aspects of historic preservation significant to Native Hawaiians.
- Other relationship to undertaking or concern with effects to historic properties.  
Please briefly describe:

ECO-SOC affiliate to Indigenous World credential at UN

### Contact information

Please take this opportunity to update the contact information on file. If no change is necessary, this section can be left blank.

Organizational Contact Name if different from above: Na KOa Ikaika KaLahui Hawaii

Mailing Address (Street, City, State, Zip Code): PO BX 6377m Hilo HI 96720

Email Address: mililani.trask@icllchawaii.com Phone Number: 10808-90-0529

Please submit this form via email to Mr. Richard Davis, USAG-HI Cultural Resources Manager, at [usarmy.hawaii.crimp@mail.mil](mailto:usarmy.hawaii.crimp@mail.mil) or by U.S. Postal mail to: Department of the Army, United States Army Garrison, Pōhakuloa, DPW Environmental – Cultural Resources Section, P.O. Box 4607, Hilo, Hawai'i 96720. Please contact Dr. Taomia at (808) 436-4280 if you have any questions.

**Comments Received from  
Thomas Lenchanko**



**From:** Thomas Lenchanko tlenchanko1@hawaii.rr.com  
**Subject:** Pohakuloa... December 12, 2020 Cultural Impact Assessment  
**Date:** December 20, 2020 at 4:38 AM  
**To:** community@honuaconsulting.com, admin@honuaconsulting.com  
**Cc:** Matthew Kahoopii matthewkahoopii@gmail.com, daniel.misigoy.mil@mail.mil, Gilda, Laura L CIV USARMY USAG (USA) laura.l.gilda.civ@mail.mil



December 20, 2020

Daniel Misigoy  
Colonel  
USAG-Hawaii  
Commanding

Loreto V. Borce  
Lieutenant Colonel  
US Army Pohakuloa  
Commanding

Ms. Trisha Kehaulani Watson JD, PhD  
Honua Consulting

Regarding: Kaohe Mauka, Hawaii Island; and 23,000 acres of State of Hawaii owned land

aloha no na kau A pauole ke kuamoo o na kupuna ma

We, Aha Ula Puuhonua Kukaniloko – aha kukaniloko koa mana mea ola kanaka maui hoalii iku pau the living evidence of those ancients buried within our homeland, continue our non-concurring posture to all injury, damages, ground disturbing activities, undertaking, programs and projects within and without the inviolable and sacrosanct Pokahuloa, relative traditional cultural property upon Hawaii Island and throughout the Hawaiian Archipelago...

Note: Please affirm and demonstrate proof of clear unbroken chain of ownership and the transfer of “exclusive territorial” jurisdiction of Kingdom of Hawaii property throughout the Hawaiian Archipelago to the United States government, its agent the State of Hawaii and the liable to public and private citizens working in their behalf...

oia ua ike a aia la

Thomas Joseph Lenchanko  
Hawaiian National, Protected Person and Private Citizen  
Aha Ula Puuhonua Kukaniloko  
kahuakaiola ko laila waha olelo aha kukaniloko koa mana mea ola kanaka maui hoalii iku pau  
808-349-9949  
[tlenchanko1@hawaii.rr.com](mailto:tlenchanko1@hawaii.rr.com)



Virus-free. [www.avg.com](http://www.avg.com)



**Comments Received from  
Kamanawa Kini**



**From:** Kamanawa Kinimaka kahukamanawa@gmail.com  
**Subject:** Re: Pohakuloa  
**Date:** January 20, 2021 at 12:16 PM  
**To:** Honua Consulting community@honuaconsulting.com

KK

Aloha Again Kehau,

This message is completely unrelated to our Kanaka kine political kine things...

I have read over your accomplishments and narratives.

Especially this:

We were born here, raised here, and are raising our families here. We work only for the good of Hawai'i, because Hawai'i is the only home we have ever known...

I believe this is at the heart of Kanaka. I hope with your continual efforts it one day may be a perspective that every human on earth is able to comprehend.

Aloha,

IKKM

On Tue, Jan 19, 2021, 9:16 AM Kamanawa Kinimaka <[kahukamanawa@gmail.com](mailto:kahukamanawa@gmail.com)> wrote:

Aloha Again Kehau,

My cousin Jon Kinimaka takes the position of full eviction of the Army from Pohakuloa if not immediately then by 2033 when the lease is terminated.

My cousin also takes the lead voice in our 'Ohana's political positions.

We are both descendants of Col. David Leleo Kinimaka, Hanai to our Late King David Kalakaua.

Mahalo again for all your hana hana, and May the Good Lord Bless and Keep your Family.

Mahalo,

IKKM

On Fri, Jan 15, 2021, 2:30 PM Kamanawa Kinimaka <[kahukamanawa@gmail.com](mailto:kahukamanawa@gmail.com)> wrote:

Mahalo Kehau for answering one of my questions.

I have read through your organization's letter several times now and also had it reviewed by one of my aids on the mainland.

I am myself new to the Hawaiian Culture. I would not be considered a Hawaiian Cultural Practitioner by the status quo of our cultural authorities of the current day. I was given away to a Haole 'Ohana at birth by my Tutu Lady Maile Kinimaka.

But I am Hawaiian and I do exist in a culture inherent that requires not only a daily interaction with Akua, Na'aumakua and Kupuna but a singularly focused moment to moment attention and dedicated worship to the Diety of Iesu Kristo.

I would like to be very frank about my worship of the Diety. A foreign scripture of another culture from the opposite side of the world was imposed onto our Kupuna, now passed on to the Po, or in modern Hawaiian Christianity the Kingdom of Heaven. And many of our gifted and dedicated Keiki 'O Ka 'Aina have fallen mentally and physically ill to the introduction of such a foreign manuscript upon a people so heavily dedicated in the current historical era of time to the worship and communion with Nature. An example of this is the recent human sacrifice and self surrender to Akua of former mayoral candidate Mr. Mikey Glendon a Kia'i of Mauna A Wakea. This is an example of the presence of Kupuna at conflict with Christian Dogma. The idea of human sacrifice is still historically fresh to the Kanaka Maoli and held by some practitioners as honorable. While in Christianity only one single sacrifice was needed to be made. The sacrifice of God's only begotten son Iesu Kristo, Jesus Christ. Yet, doesn't that also encourage the idea that suicide is acceptable compounded with the notion that human sacrifice is honorable as well? I observe this confusion and complicated spiritual phenomenon especially in Kanaka Maoli Men.

Yet, the cognitive dissonance even though negative in parts is actually the needed cultural salvation for the hypocrisy of abrahamic religions. It is the reform of a relationship with the Divine through the protection of, communication with and technology forgotten through all aspects of nature. Abrahamic Religions possess a part of a greater story, but indigenous perspectives and Eastern philosophy must be interwoven into the very modern challenges of today's chaos and anarchy to stabilize the World's Security. Iesu Kristo provides the Avenue for the Kanaka Maoli to represent the potential of a new covenant with Akua through accessing Ho'o Mana (I always credit Kupuna Dr. Marie Alohalani Brown the Hawaiian Religion Professor of U.H. Manoa for the identity of what the practice is called.)

If the Bible was written and established by a patriarchal entity and then perpetuated by a consumeristic colonizing entity then doesn't our human salvation potentially exist within our own making by assessing Akua and our relationship with the Creator and the Creation through an indigenous matriarchal cultivating lense?

I am going to pose a question. If I as a practitioner recognize Snow as the Kino Lau of Poli'ahu, then is she therefore present in all things that are considered and associated with Snow? Not only ecologically and geographically but also metaphorically, spiritually, mentally poetically, verbally and linguistically.

The United States of America represents a out of date, archaic model of authority regarding human freedom, because the idea of freedom was still exclusive. Luckily, the Kingdom of Hawai'i dormant like Mauna Kea has been resting for the last 128/129 years. And in needing to gather in its protection we witness a host culture welcoming alternative cultural perspectives as offerings of ho'okupu. True and ancestral diplomacy on all accounts offered in faith and aloha versus contracts and currency.

You, Kehau and your consultation firm have a true opportunity to create changes that usher in a new era of our people at the most important and vital seat of a global discussion.

When you have that discussion I pray with all good intentions that Tutu Pele and the Tutu Lady Haumea are present by your side, because as I am sure you are aware...The Department of the Army of the United States of America continues to physically encroach upon the territory of the Matriarchal Akua.

This storyline is just a continuation and retelling of the same inappropriate non-consensual relationship between a patriarchal figure like Wakea with victimized figure like Ho'ohokuokalani. If we correct the storyline, the mo'olelo then we fulfill our responsibility as a chosen and favored People of God.

Therefore, in my humble sight towards global salvation the only redress towards the affront on the occupied land by the Department of the Army to better support the cultural demands of the host culture they are guests of would be to stop physically altering or infringing upon the physical manifestations of our Akua and Kupuna and facilitate a new approach towards global security.

The Hula. Halau O Kekuhi and the Kanak'ole Foundation would be the most appropriate in facilitating a complete transition of the Training Facility. Instead of our Native Community pushing for total removal and eviction of Pohakuloa in 2033, perhaps we re-engineer the entire purpose of the military industrial complex to a method of self protection and security that far outweighs the continued study of a bomb.

I however am just one voice speaking on behalf of myself. I realize that you have taken the time to entertain the radical ideas of a slowly deteriorating friar...thank you for listening to my vision for our people.

Akua Bless and Keep you and your 'Ohana, Now and Forever.

Faithfully,

Iosua Kamanawa Kinimaka Mano'I

On Thu, Jan 14, 2021, 8:49 PM Honua Consulting <[community@honuaconsulting.com](mailto:community@honuaconsulting.com)> wrote:

Aloha e Iosua,

I don't mind at all. I'm proud of my family and it's a totally appropriate ask. Mahalo for asking. I've only included some of my Hawaii Island ties below. I'm happy to provide more information if you want.

My full name is Trisha Kehaulani Watson-Sproat. My grandfather was Walter Oliver Lehuanani Watson Jr. His family are Victors from Hilo side (my great great grandmother was Lucy Pe'a Victor). My grandfather was born in Hilo, as was my father and two of his siblings. My grandmother was a Hoapili and a Naipo. My great great grandmother on my great grandmother's side was Eliza Kaaionalani Naipo of Kohala. My great great great grandfather was Judge John Green Ulumaheihē Hoapili Kanehoa of Kona, his daughter Lydia Kamakanoe Hoapili was my great great grandmother.

My husband is Matthew Kawaiola Sproat, the singer from Waipuna, and his family is originally from Kohala. I'm pretty sure I got all of those correct :) Matt and I were both born on Oahu.

Mahalo nui,  
Kehau

On Jan 11, 2021, at 2:39 PM, Kamanawa Kinimaka <[kahukamanawa@gmail.com](mailto:kahukamanawa@gmail.com)> wrote:

Aloha Kehau,

What a beautiful name. 😊😊

I appreciate your very respectful manner. Before we chat on the phone, I would like to become more acquainted with what information exactly you are tasked in gathering?

information exactly you are tasked in gathering:

And where are you and your family originally from if I may ask?

Mahalo,

Iosua Kamanawa Kinimaka Mano'i

On Sun, Jan 10, 2021, 3:57 PM Honua Consulting <[community@honuaconsulting.com](mailto:community@honuaconsulting.com)> wrote:

Aloha e Iosua,

Apologies for the delay in responding. I was largely out of the office this week. I would love the opportunity to speak with you.

Is there a best time for us to talk? '

Mahalo nui,  
Kehau Watson

> On Jan 4, 2021, at 1:57 AM, Kamanawa Kinimaka <[kahukamanawa@gmail.com](mailto:kahukamanawa@gmail.com)> wrote:

>

> Aloha,

>

> I am Iosua Kamanawa Kinimaka Mano'i.

> One of my Kahus forwarded me a letter from your organization regarding Pohakuloa.

>

> You are free to contact me directly for the time being at (808) 345-8063.

>

> Mahalo Piha

>

> IKKM



**The resources and materials provided by  
Kyle Kajihiro can be found appended in the EIS.**





**Revised Cultural Impact Assessment Report for the Army Training Land Retention of  
Pōhakuloa Training Area**

**Appendix C: Interview Questions and Summaries**

Prepared by



January 2024

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## Interview with Kamana Kapele

**Interviewer:** Trisha Kehaulani Watson

**Interviewee:** Mana Kapele

**Date:** September 12, 2021

**Location:** via phone

### Biography

Mr. Kapele is self-employed and retired. He currently lives in Kealahou on Hawai'i Island. He was born on O'ahu and raised in Kāne'ohe until the mid-1960s, when his family then moved to Hawai'i Island. In this interview, he represents his family and others who share a similar connection and association with the project area.

### Overview

Mr. Kapele's association with the project area is through his own namesake. Pu'u Kapele, a prominent geographic feature in the project area, is associated with his family name. He is also associated with the ki'i and shrine next to the pu'u.

### General Discussion

When asked about specific place names associated with the project area, Mr. Kapele mentioned Kilohana and Hāmākua. He also noted that Kona District and Hāmākua District merge at Pu'u Kapele.

Mr. Kapele shared the story of the shrine during the interview. Mr. Kapele was raised by his grandfather and spent his early childhood with him before moving to Hawai'i Island. He recalls fondly the vivid memories and dreams associated with his childhood, which include spending time with his grandfather. After moving to Hawai'i Island, his grandfather passed away.

In the early 1990s, he had a tremendous spiritual awakening. Mr. Kapele noted that he would receive information (names of places and people) which he described as surfacing within his mind. Not knowing where this information had originated, Mr. Kapele recounted how he eventually realized that this received information was coming from his late grandfather. This prompted him to join the sovereignty movement. The eclipse of 1991 was a part of this journey, said Mr. Kapele.

Around 2000, a friend of Mr. Kapele notified him that the military was leasing Pōhakuloa and Pu'u Kapele. Noting the shared namesake, he began a journey to Pu'u Kapele. He noted that while he had never been to Pu'u Kapele before, he knew how to get there. When he arrived, it was as if he had been there before, as if he had stood in the exact place generations ago. Then, Mr. Kapele describes hearing his ancestors' voice ask him to "find the stone". He walked through the grass in the area, soon finding a stone covered in dirt. After wiggling it free, he discovered one half of a geode.

Understanding this to be of spiritual significance, Mr. Kapele placed the stone to serve as an ahu. He recited a pule. As he was preparing to leave, Mr. Kapele recounted that he heard the voice instruct him to find the other half. After walking through the field, he then found the other half of the geode partially buried. He joined the two halves of the geode together, which fit seamlessly.

Mr. Kapele noted that this experience shows that Native Hawaiian spiritual practices are alive and well. They are not only distant stories. From this experience, Mr. Kapele noted how other insights came. The establishment of the ahu in the early 2000s prompted him to meet with the military later in 2004. The discussion focused primarily on the Queen's protest. He noted that his time spent in spiritual reflection and within the sovereignty movement have provided him with a further understanding of history, law, and cultural practice.

Eventually, Mr. Kapele and his family were granted access to Pu'u Kapele with military escort. This is the only way Mr. Kapele and his family can now visit Pu'u Kapele. Mr. Kapele had previously been able to access Pu'u Kapele without escort, prior to blockades on the old hunting roads, along with fencing which was constructed after the bypass. He noted that visiting Pu'u Kapele was not associated with a specific time, but rather that he would access it whenever he felt called to do so.

Mr. Kapele specifically described how the Queen's protests are relevant today, not just for his family, but also for the Hawaiian Islands and kānaka maoli overall. Through his years of research and spiritual practice, he has come to realize that the Queen's protest is more than just an appeal by a private person, and is rather a document that was entered under a condition of war. It is a wartime convention to prevent the loss of life and a suspension of hostilities until a treaty of peace terminates the war. The terms and stipulations laid out in the treaty, recounted by Mr. Kapele, state: until such time that the government of the United States shall, upon the facts being presented to it, undo the action of its representative, reinstate me in the authority I claim as the constitutional sovereign of the Hawaiian Islands.

Mr. Kapele noted that these terms and stipulations have been established, and questions how the United States can continue its illegal occupation. Mr. Kapele stated that it is their responsibility, as descendants of the Queen, to carry on her work.

### **Cultural Resources**

Mr. Kapele confirmed that Pu'u Kapele, the ki'i, and the shrine are all cultural resources. He noted that Pu'u Kapele is fenced off due to the endangered species of plants found in the habitat, specifically honohono (an endemic mint).

### **Traditions and Customs**

Mr. Kapele noted that his family makes regular visits to the site for spiritual and religious practices. He noted that his traditional and customary association with the project area is centered on Pu'u Kapele. However, he also noted that Native Hawaiian traditional and customary beliefs suggest that there is connectivity between sacred spaces, and that other prominent pu'u in the area, including Pu'u Ke'eke'e, are also culturally significant.

### **Impacts**

Mr. Kapele noted that should the military retain its usage and lease of the land, they will continue to bomb and degrade the environment. He explained that in agreeing to the continued military usage of Pōhakuloa is to agree to the desecration of other sacred sites. Mr. Kapele also noted that another impact would be the continued barring of access to important cultural and religious sites.

**Mitigation Measures & Recommendations**

Mr. Kapele has been working with personnel at Pōhakuloa regarding access. He believes that access to his spiritual areas, including Pu‘u Kapele, should be free access.

## Interview with Dr. Ku Kahakalau

**Interviewer: Mathew Sproat**

**Interviewee: Dr. Ku Kahakalau**

**Date: 10/15/2022**

**Location: via telephone**

### Biography

Dr. Kahakalau is an educator, researcher, activist, and cultural practitioner. Dr. Kahakalau lives in Kukui Haile above Waipi'o Valley. She was born and raised in Honolulu. Dr. Kahakalau represents Kū-A-Kanaka, a Native Hawaiian social enterprise which is registered as an interested party with PTA.

### Overview

As a researcher, educator, and cultural practitioner, Dr. Kahakalau brings a wealth of knowledge regarding Native Hawaiian practices and customs that take place in the area. Dr. Kahakalau stated that the entirety of the land at Pōhakuloa was culturally significant, and that any negative impact to the land by the Army was a negative impact on the integrity and psyche of Native Hawaiians, beyond the negative impacts to the land itself.

### General Discussion

Dr. Kahakalau explained that the whole project area is culturally significant. All land is seen as an older sibling. It has a responsibility to take care of us, and we as younger siblings have a responsibility to serve that land. She shared a metaphor that just as her grandmother is important and significant to her (not just a finger, an ear, etc.), so are the lands at Pōhakuloa. Any part that is being destroyed, abused, or poisoned, is a destruction to the goddess Papahānaumoku and her children, Native Hawaiians. That someone who has no responsibility to this land feels entitled to hurt and kill the living land is an offense to Native Hawaiians.

Regarding stories, Dr. Kahakalau said that there is an association with Līloa and Umi-a-Līloa. There are other stories related to the iwi kupuna that are found in the area. All these stories indicate that kūpuna existed and thrived in the area to the extent the environment would allow. Other stories include the battles of Kamehameha and other warriors who crossed the area while transiting the island.

Dr. Kahakalau explained that Pōhakuloa was designated as within the ahupua'a of Ka'ohē in the district of Hāmakuā by kūpuna (except for a little part that is on the Kohala side). Ka'ohē reaches over to Mauna Loa.

### Cultural Resources

In the project area, Dr. Kahakalau said that there is evidence of the presence of Native Hawaiian ancestors and practitioners. The area has been used for cultural practices for a very long time. This includes sacred sites including a heiau built by Umi-a-Līloa (which has not been found physically but is mentioned in historical records) at Pu'u Ke'eke'e. There are also iwi kupuna and burial sites in the area, some just recently found in caves. In the area are also shelters which were used by Native Hawaiians traveling over the mountain.

Other place names in the general area include Pu'u Ke'eke'e, Pu'u Kapele (significant for Dr. Kahakalau and other 'ohana). There are also many other pu'u in the area that are culturally significant, and all of which have names. Dr. Kahakalau explained that all the areas or geographic features which have been named by kupuna carry cultural significance.

### **Traditions and Customs**

Dr. Kahakalau and a group of Native Hawaiian practitioners have three years' of makahiki celebrations and ceremonies where they access Pōhakuloa. Makahiki ceremonies were conducted traditionally during the "winter" or wet seasons. The ceremonies typically involved gifts to Lono asking for fertility across the 'āina, ocean, people, animals, etc. Due to Americanization and Christianization, many of these practices ceased. In the 1970s, the ceremonies were revived again. Makahiki is practiced across all of Polynesia for the last 2,000 years. Dr. Kahakalau explained that the purpose of the Makahiki practice at Pōhakuloa is to bring fertility, peace, and growth back to the area which has been desecrated, bombed, and raped by the US military.

Dr. Kahakalau explained that traveling from one place to another is a cultural practice. As such, all the paths that go through Pōhakuloa were utilized by kupuna to provide access across the island. These paths have also been used during modern times.

Dr. Kahakalau noted that gathering and hunting are also cultural practices that take place in the area. These subsistence lifestyle practices carry cultural significance. Other resources gathered in the area include pōhaku, māmane, and a'ali'i. The a'ali'i in the area have a deeper and darker color than elsewhere, adding to the plants' cultural significance. Historically the area was likely used for bird gathering (both for food and feathers). There is also a current practice of water gatherers that has been ongoing.

Dr. Kahakalau explained that in order to gain access to the sacred places, practitioners have to work hard with the military. It was easier with the former Commander who was local and married to a Native Hawaiian. For example, with the new Commander, practitioners have to ride in military vehicles to access sacred sites. Practitioners must also be accompanied. For individual practitioners, getting a permit is quite difficult. For hunters, there are separate avenues to get permission to access.

Access to the impact zone is prohibited. There are no archaeological or cultural surveys planned for the impact zone despite having the funding, which Dr. Kahakalau finds problematic. Dr. Kahakalau explained that they have been denied access on specific dates, and noted that from the perspective of the Army, their training dates are more important than cultural practitioners.

### **Impacts**

Dr. Kahakalau explained that the land is the resource most severely impacted, along with the water. Dr. Kahakalau noted that the military has looked for water in the area since they currently have to haul water with trucks. Depleted uranium may leach into the groundwater.

Dr. Kahakalau stated that the land has suffered for too long for no reason whatsoever. She claimed that the military is not doing what they say they are doing: practicing for defense. They are practicing for offense and to invade elsewhere. The impact of bombing on the land harms a physical resource, natural resource, and spiritual resource which impacts Native Hawaiians.

Regarding flora, impacts to māmane will impact the palila. For this reason, there are efforts to conserve māmane trees.

Dr. Kahakalau shared that several weeks ago, a purposeful fire got out of hand and burned miles of the land. Hawai'i Island firefighters and local resources had to be used in order to fight the fire.

### **Mitigation Measures and Recommendations**

Dr. Kahakalau believes that the way to mitigate the impact is to not renew the lease agreement and end the training at Pōhakuloa. The last lease has been violated multiple times, which is another reason it should not be renewed. Allowing the military activities in the area to continue will result in further destruction, desecration, and damages to everything Native Hawaiians are – including their way of life.

Dr. Kahakalau reiterated that if the military is using the land, there is no way to lessen the impact. The most important impact is on the psyche of the Hawaiian people. The impact represents that the Hawaiian culture and way of life is of no value to the United States military. And that is an impact that cannot be lessened or mitigated.

## Interview with Carl Sims

**Interviewer: Mathew Sproat**

**Interviewee: Carl Sims**

**Date: 10/15/2022**

**Location: In person**

### Biography

Mr. Sims is a part-time taro farm and landscaper. He currently lives in Waipi'o Valley. Mr. Sims was born and raised in Hāmakua, specifically in Waipi'o Valley. As such, he is an active member within the community. Mr. Sims is associated with the project area through Native Hawaiian practices. He specifically mentioned Pu'uhuluhulu and making offerings to the associated kuahu.

### Overview

Mr. Sims brings an awareness and understanding of how impacts on Mauna Kea and the general area of Pōhakuloa can also impact downstream environments and communities. He believes that the current trainings and Pōhakuloa can eventually negatively impact downstream areas such as Waipi'o in addition to negatively impacting the immediate area.

### General Discussion

Mr. Sims explained that other place names associated with the project area include the ahupua'a of Ka'ohe. It reaches from the nu'u of Mauna Kea to Waipi'o Valley. There is a trail called the Umi-a-Līloa that went from the back of Alakahi into Waimea (Mana Road). All these communities had trails that went to Mauna Kea to get materials at the adze quarries.

Mr. Sims explained that the training area is historically and culturally significant. Mauna Kea and its associated lands allow people to commune with ke akua more closely. Regarding stories, Mr. Sims said there are many stories associated with the general area, including the Native Hawaiian creation story of Papa and Wākea.

While the Army has stated that the Army has not restricted access to the area, Mr. Sims says that this is not true.

### Cultural Resources

Mr. Sims noted that there are endemic species of plants that are wholly unique to the environment of the area. Beyond plants, Mr. Sims explained that the adze quarries in the regions are very culturally significant. Mr. Sims also said that perhaps the most significant cultural resource in the area is the freshwater aquifer that exists beneath Mauna Kea. This aquifer and watershed on the mountain feed the lower valleys, including Waipi'o.

### Traditions and Customs

Mr. Sims noted that he and other Native Hawaiians conduct various cultural practices in the area. Protocols include acknowledging ancestors and those who came before them. These protocols include saying prayers for guidance during these hard times and offering ho'okupu. Others practice

gathering plants for la'au lapa'au and cultural practices (particularly during the hula festival, Merrie Monarch). Mr. Sims noted that his uncle owns a ranch in the area on Hawaiian Homelands that he grew up on. Regarding hunting, Mr. Sims explained that people use the area for hunting regularly (including himself a few times a year).

### **Impacts**

Mr. Sims believes there may be an impact to the water resources in the project area. He believes that in the long run, the training in Pōhakuloa will pollute and contaminate the water resources (including the water table). Mr. Sims believes that eventually this will impact the quality and quantity of the water in Waipi'o Valley. This water is vital for taro farming and subsistence agriculture in the valley.

Mr. Sims also believes that the munitions used in training will also negatively impact native species of plants and animals.

Mr. Sims noted that the training itself disrespects the many cultural resources in the project area and the cultural practices associated with the project area. He explained further that he has been denied access to culturally significant areas by the military.

### **Mitigation Measures and Recommendations**

Mr. Sims believes that the land not being leased to the military for training purposes would mitigate the negative impacts to the environment, water, flora, and fauna. Regarding impacts to customary practices, including access, Mr. Sims believes the best mitigation measure would be to allow more access by cultural practitioners. Allowing people access for cultural practices should be "set in stone".

Should the Army retain the lands past 2029, Mr. Sims believes they should be aware of the cultural sites and resources (including plants and animals) that exist in the area. The Army should also mitigate impacts to water resources. Mr. Sims recommends less training using live munitions and bombing, such as depleted uranium.

## Interview with Dr. Michelle Noe Noe Wong-Wilson

**Interviewer: Mathew Sproat**

**Interviewee: Dr. Noenoe Wong**

**Date: 11/10/2022**

**Location: via telephone**

### Biography

Dr. Wong-Wilson is retired from the University of Hawai'i system. She is executive director of the Lāla'kea Foundation, a 501(c)(3). She has lived on the island of Hawai'i since 1989, and was born and raised in Kailua, O'ahu.

### Overview

In this testimony, Dr. Wong-Wilson represents herself, her 'ohana, and the Hawaiian Civic Club of Hilo through her role as president. Ms. Wong-Wilson is associated with the project area, stating that she is a part of the "land basin" of the area. She noted that the land basin between Mauna Kea and Mauna Loa is highly significant. Dr. Wong-Wilson also explained that the military activities in the area are a major concern and pose a negative impact to herself, her 'ohana, and the organizations she represents.

### General Discussion

Regarding place names, Dr. Wong-Wilson shared that each pu'u and most of the geographic features in the area have specific names. Dr. Wong-Wilson also shared that there are many stories associated with the general area (outside the specific 23,000 acres), including the winds, weather, clouds, etc. These stories are important to fostering a relationship with the environment.

### Cultural Resources

Dr. Wong-Wilson explained that adjacent to the 23,000 acres is the piko of Moku o Keawe – the geographic center of Hawai'i Island. This area is culturally significant. Dr. Wong-Wilson further noted that from a western perspective, examining the impact to an area relies on drawing lines or boundaries of said area. However, for her, she does not believe you can separate impacts to one area from another. The entire area and region are culturally significant – from the summit of Mauna Kea to the summit of Mauna Loa.

Dr. Wong-Wilson noted that there is scientific and archaeological evidence of structures that are recently being discovered. The stone structures that have been erected may have correlations with geographic locations. A prominent theory is that the structures were further correlated with navigation, hence why the pu'u in the area are often named after astronomical bodies and their function. Each pu'u is culturally significant. As such, the area had a very specific function.

Dr. Wong-Wilson shared that there are iwi and burials in the area. These burials were likely for ali'i.

Water is an important cultural resource in the area, and Dr. Wong-Wilson expressed disapproval of the military tapping into the springs from the Mauna. She also expressed disapproval of the building of roads and facilities, which are damaging to the area.

## Traditions and Customs

Dr. Wong-Wilson noted that there is a select group that are given access by the military to the area. She believes that if access weren't restricted, there would be more practitioners who would access the area.

Dr. Wong-Wilson shared that even though there is a lack of evidence to suggest that people historically lived in the area long-term (given the harsh environment), there is growing evidence to suggest that the area was historically frequently used by kūpuna for various traditions and customs. This adds to the sacredness of the area.

There are various reasons that people may want to access the area. These include cultural practices, hunting, gathering, or learning about the archaeological connections that have been detained by the Army. Regarding gathering, Dr. Wong-Wilson explained that there are native plants that grow in the area that are used in cultural practices. She also shared that the a'ali'i that grows in the area is different than anywhere else.

## Impacts

Dr. Wong-Wilson believes that bombing has impacts beyond the training area. She recounted that when their group was about six miles from a live-fire training, the entire earth shook. The sound reverberates from the bombing and machine guns. She explained that the trainings can be heard and felt from Hilo, Waimea, and Waikōloa. Dr. Wong-Wilson shared that in her view, Native Hawaiians are inseparable from the 'āina, with specific ties to the places Native Hawaiians are born, raised, live, and the places of their kūpuna. As such, the ongoing possession of the land by the military can be viscerally felt by, and are painful for, those who are connected to the 'āina.

There are culturally significant pu'u in the area. The general public is denied access to the 23,000 acres. The only thing allowed is to drive along the highway, and if a vehicle stops, the military will investigate. Hunting and gathering by the general public is not allowed. A small group is allowed in beyond the barriers, but only with arrangements with the military. Dr. Wong-Wilson also shared that her group inquired about viewing the artifacts that had been discovered in the area. The military noted that such a viewing would have to be arranged.

Dr. Wong-Wilson explained that to get access, one would have to reach out to the public affairs officer. However, in practice, only a small group of practitioners (6-7 individuals) have historically been granted access.

As such, access is very limited to the community and general public, which is an impact to traditions and customs. The military does not have a program which invites the community in.

## Mitigation Measures and Recommendations

Regarding live-fire training and bombing, Dr. Wong-Wilson has continually posited the question: why can't live-fire trainings and bombings be simulated? Further, she feels that the military has not provided a satisfactory answer as to why the bombs used for training have to have live warheads.

Dr. Wong-Wilson does not believe that the military needs the 23,000 acres. She explained that the military has repeatedly said that they do not use the area for training. Rather, the military needs the

## **Appendix C: Interview Questions and Summaries**

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23,000 acres as a connection between two parcels that the military owns. She believes that the military could move its administrative buildings to their own land holdings and return the 23,000 acres to the state.

Should the military be able to retain the 23,000 acres, Dr. Wong-Wilson believes that there needs to be greater access allowed to the public.

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# Archaeological Literature Review



**Archaeological Literature Review for  
Army Training Land Retention at Pōhakuloa Training Area  
Project, Ka‘ohe Mauka and Humu‘ula Ahupua‘a,  
Hāmākua and Hilo Districts, Island of Hawai‘i**

**TMKs (3) 3-8-001:013 and :022, (3) 4-4-015:008, (3) 4-4-016:005, and (3) 7-1-004:007**

*Prepared By:*

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Hawai‘i SHPD Permit No. 23-07

KLF Project No. 02430000.GNDA



13 March 2023

## **MANAGEMENT SUMMARY**

Kleinfelder, Inc. prepared an archaeological literature review for the Army Training Land Retention at Pōhakuloa Training Area (PTA) project located within the ahupua‘a of Ka‘ohe Mauka (Hāmākua District) and Humu‘ula (Hilo District) on the island of Hawai‘i. The project does not involve new training, construction, or resource management activities at PTA. Instead, it is a real estate/administrative action that would enable continued military use of the State-owned land.

The current study consists of background archival research, a records search at the State Historic Preservation Division Library in Kapolei, and a review of archaeological reports and geographic information system (GIS) data on file with the PTA Cultural Resources Management Program. This archaeological literature review also includes summary discussions on previously conducted archaeological work and known archaeological resources within the project area; these summaries were limited to prior studies and site information approved for use by the U.S. Army Garrison-Hawaii. The results of this literature review and desktop analysis lead to recommendations to ensure impacts to culturally and historically significant archaeological sites are identified, mitigated, and managed.

## CONTENTS

Management Summary.....	i
List of Figures .....	iii
List of Tables.....	iii
1.0 INTRODUCTION.....	1
1.1 Project Overview .....	1
1.2 Regulatory Framework.....	4
1.3 Project Area Description .....	4
1.4 Definition of Historic and Cultural Resources .....	6
2.0 BACKGROUND .....	6
2.1 Environmental Context.....	6
2.2 Traditional Hawaiian Land Use.....	8
2.3 Early Post-Contact Accounts.....	13
2.4 The Māhele and Land Tenure Change.....	14
2.4.1 LCA and Kuleana Claims within Project Area .....	15
2.5 Historic Period Land Use .....	15
2.5.1 Cattle and Sheep Industry .....	15
2.5.1.1 Parker Ranch.....	17
2.5.1.2 Humu‘ula Sheep Station .....	17
2.5.2 U.S. Military Land Use.....	19
3.0 ARCHAEOLOGICAL CONTEXT .....	22
3.1 Previous Archaeological Studies within the Project Area .....	22
3.1.1 PTA Cultural Resources Management Studies .....	27
3.1.2 Consultant Studies .....	27
3.2 Previously Recorded Sites in State-Owned Land of PTA .....	30
3.2.1 Traditional Hawaiian Sites.....	30
3.2.1.1 Temporary Habitation Sites .....	30
3.2.1.2 Excavated Pāhoehoe Pits .....	39
3.2.1.3 Lithic Quarries .....	40
3.2.1.4 Trails .....	41
3.2.2 Historic Period Sites .....	42
3.2.2.1 Ranching Sites .....	42
3.2.2.2 Trails, Transportation, and Land Survey Associated Sites .....	42
3.2.3 Recent Military Features.....	42
4.0 HISTORIC ARCHITECTURAL RESOURCES .....	42
5.0 CONCLUSIONS .....	43
6.0 REFERENCES.....	44

## FIGURES

Figure 1. Project area depicted on 2004 USGS quadrangle. ....	2
Figure 2. Project area and roadways within project area depicted on aerial imagery. ....	3
Figure 3. Project area showing TMK and Real Property Tract parcel boundaries. ....	5
Figure 4. Geological units within the project area. ....	7
Figure 5. Map of the island of Hawai‘i showing schematic routes of ‘Umi’s trails. ....	10
Figure 6. Portion of 1891 Hawai‘i Government Survey Map showing place names. ....	12
Figure 7. Preparing cattle for loading on an approaching steamer in Kawaihae Harbor. ....	18
Figure 8. 1926–1927 USGS quadrangle maps showing a telephone line. ....	20
Figure 9. 1964 aerial photograph showing post-World War II developments at PTA. ....	21
Figure 10. Overview map showing areas of new lava and survey coverage of previous archaeological studies within the project area. ....	23
Figure 11. Detail map 1 showing archaeological studies and new lava within the project area. ....	24
Figure 12. Detail map 2 showing archaeological studies and new lava within the project area. ....	25
Figure 13. Detail map 3 showing archaeological studies and new lava within the project area. ....	26
Figure 14. Overview map showing archaeological sites within the project area. ....	31
Figure 15. Pictograph panel at SIHP 23450, photograph from Brown et al. (2008:169). ....	37
Figure 16. Ti leaf sandals (ti kama‘a) from SIHP 19490. ....	38
Figure 17. Entrance 3C at SIHP 23694 where human remains were documented. ....	38
Figure 18. Plan view of pit features and excavation unit at SIHP 23455. ....	39
Figure 19. Volcanic glass artifacts recovered from excavations at SIHP 19490. ....	40
Figure 20. Plan view showing trail segments (Features F and K) mapped at SIHP 19490. ....	41

## TABLES

Table 1. Kuleana Claims for Ka‘ohe Ahupua‘a. ....	15
Table 2. Archaeological Studies Conducted by PTA CRM Staff. ....	28
Table 3. Archaeological Studies Conducted by Consultants. ....	29
Table 4. Archaeological Sites within the Project Area. ....	33

## **1.0 INTRODUCTION**

At the request of Group 70 International, Inc. (G70), and on behalf of the U.S. Army Corps of Engineers, Honolulu District, Kleinfelder, Inc. prepared an archaeological literature review for the Army Training Land Retention (ATLR) at Pōhakuloa Training Area (PTA) project located within the ahupuaʻa of Kaʻohe Mauka (Hāmākua District) and Humuʻula (Hilo District) on the island of Hawaiʻi (Figure 1 and Figure 2). PTA encompasses approximately 132,000 acres of U.S. Government-owned and State-owned land. Since 1964, the U.S. Government has leased approximately 23,000 acres of State-owned land (the project area) which has been a keystone of PTA, supporting numerous facilities and capabilities that are deemed essential to U.S. Army Hawaii (USARHAW) and other military services and local agencies. This lease expires in August 2029.

G70 is preparing an Environmental Impact Statement (EIS) for the ATLR at PTA project which does not involve new training, construction, or resource management activities at PTA. Instead, it is a real estate/administrative action that would enable continued military use of the State-owned land. The EIS evaluates the potential impacts of a variety of reasonable alternatives that meet the purpose and need of the project. Alternatives analyzed in the EIS include 1) Full Retention, 2) Modified Retention, 3) Minimum Retention and Access, and 4) a No Action Alternative (no retention of State-owned land after 2029).

The current study consists of background archival research, a records search at the State Historic Preservation Division Library in Kapolei, and a review of archaeological reports and geographic information system (GIS) data on file with the PTA Cultural Resources Management (CRM) Program. This archaeological literature review also includes summary discussions on previously conducted archaeological work and known archaeological resources within the project area; these summaries were limited to prior studies and site information approved for use by the U.S. Army Garrison-Hawaii (USAG-HI).

### **1.1 Project Overview**

The ATLR at PTA project proposes to retain up to approximately 23,000 acres of State-owned land prior to the expiration of the current lease to ensure training is not interrupted. The Army's Proposed Action does not include retention of approximately 250 acres of State-owned land that is managed and administered by the Department of Hawaiian Homelands (DHHL). Following retention of the project area (or portion thereof), the Army would continue to conduct ongoing activities (training and other activities such as public use programs). The Army would continue to permit and coordinate training and other activities on the retained State-owned land by other PTA users.

The purpose of the ATLR at PTA project (a Proposed Action) is to enable USARHAW to continue to conduct military training on the State-owned land within PTA to meet its ongoing training requirements. The Proposed Action is needed to enable access between major parcels of U.S. Government-owned land in PTA, retain substantial Army infrastructure investments, allow for future facility and infrastructure modernization, preserve limited maneuver area, provide austere environment training, and maximize use of the impact area in support of USARHAW-coordinated training.

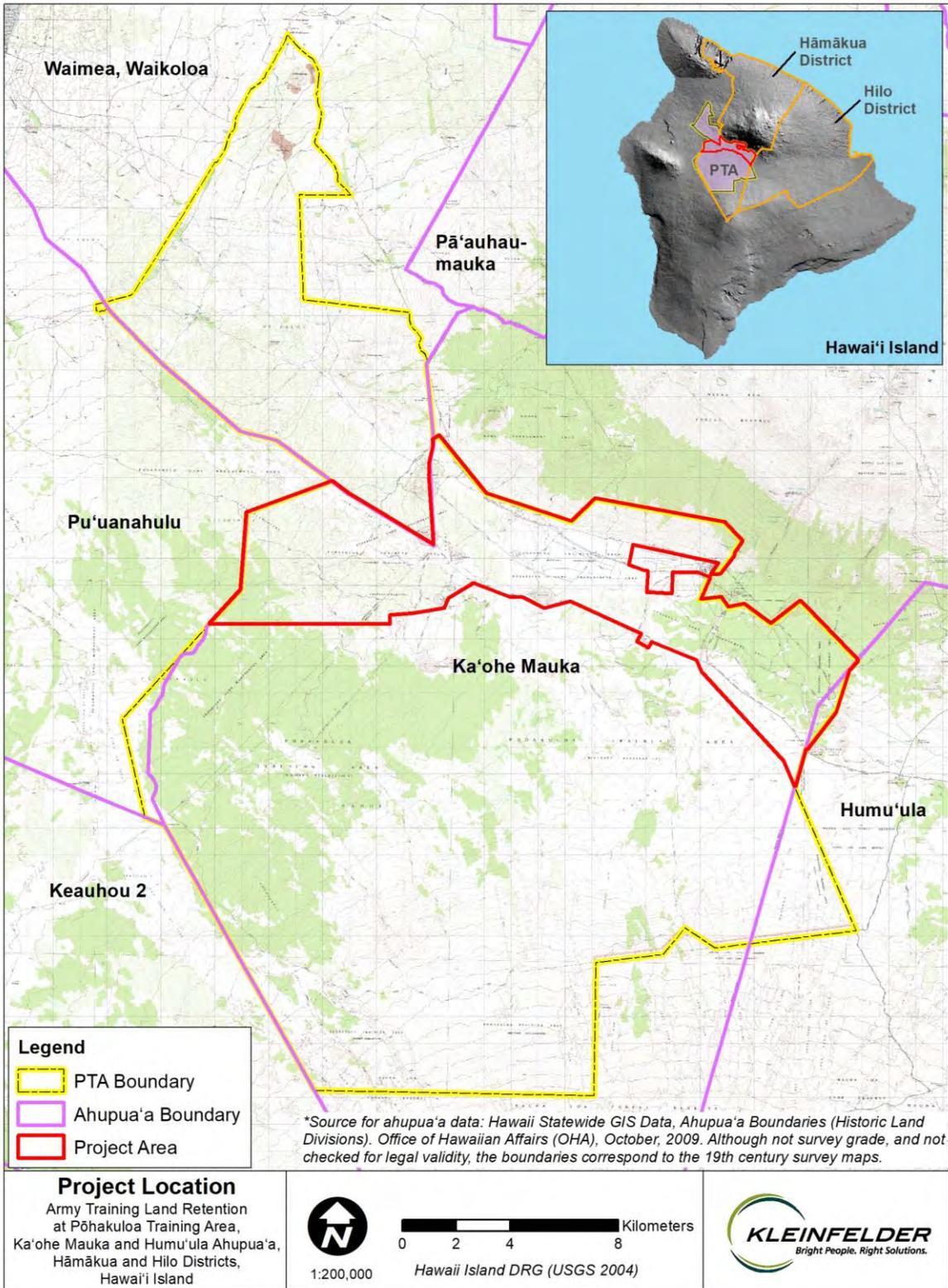


Figure 1. Project area depicted on 2004 USGS quadrangle.

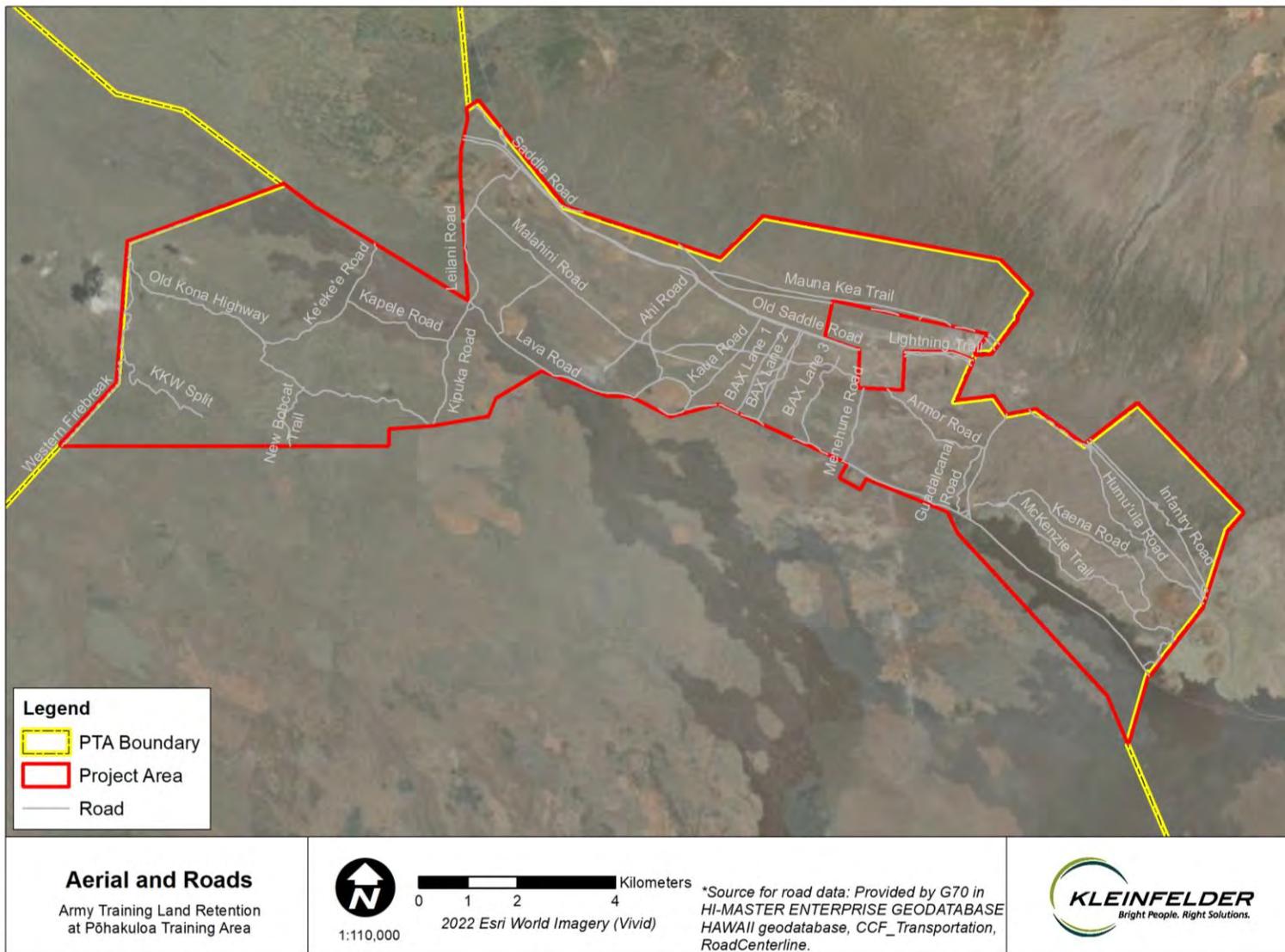


Figure 2. Project area and roadways within project area depicted on aerial imagery.

## **1.2 Regulatory Framework**

The Proposed Action requires compliance with the National Environmental Policy Act of 1969 (NEPA). NEPA directs federal agencies to examine the direct and indirect environmental impacts that may result from the Proposed Action and alternatives, including potential impacts to “historic and cultural resources” (42 United States Code 1502.16). NEPA requirements ensure that environmental information is available to public officials and citizens for review before decisions are made and before actions are taken. The EIS will address relevant laws and regulations to provide decision makers with a comprehensive overview of the regulatory issues associated with the Army’s Proposed Action.

The Army is initiating an EIS process under the Council on Environmental Quality NEPA implementing regulations in Title 40 Code of Federal Regulations (CFR) Parts 1500–1508, and Army NEPA implementing regulations in Title 32 CFR Part 651. The EIS will also fulfill the Hawai‘i EIS statute and implementing rule, codified in Hawai‘i Revised Statutes (HRS) Chapter 343 and Hawai‘i Administrative Rules (HAR) Chapter 11-200-1. Collectively, the Hawai‘i statute and rule are referred to as the “Hawai‘i Environmental Policy Act (HEPA).” Like NEPA, HEPA requires disclosure of the direct and indirect effects of a Proposed Action and alternatives on the environment, including “natural and human-made resources of historic, archaeological, or aesthetic significance” (HAR 11-200-17).

This document is meant to support the NEPA review process by compiling background information on existing conditions of tangible cultural resources (historic architectural resources and archaeological sites) known to exist within State-owned land at PTA. This document will be appended to the EIS as a contributing technical study. The effects on cultural practices, areas of traditional importance, and intangible cultural resources are evaluated through a cultural impact assessment (CIA) prepared in accordance with the Hawai‘i Office of Environmental Quality Control “Guidelines for Assessing Cultural Impacts” (adopted November 19, 1997). The Army has contracted for the completion of a CIA in support of the HEPA requirement through a separate technical study.

## **1.3 Project Area Description**

The project area consists of State-owned land within PTA that is currently leased by the U.S. Government which encompasses five Tax Map Key (TMK) parcels: (3) 3-8-001:013 and :022, (3) 4-4-015:008, (3) 4-4-016:005, and (3) 7-1-004:007 (Figure 3). These parcels are also referred to as “Parcel A” (Tract A-105-1), containing approximately 15,420 acres; “Parcel B” (Tract A-105-2), containing approximately 1,944 acres; and “Parcel C” (Tract A-105-3), containing approximately 5,607 acres (Figure 3). These parcels are designated by the Army as Training Areas (TAs) 1–22, although TAs 16, 17, 21, and 22 also include portions of U.S. Government-owned land.

The eastern two-thirds of the project area consists of a roughly two-mile-wide corridor extending northwest-southeast through PTA along the Saddle Road (State Route 200) corridor between Gilbert Kahele Recreation Park to the east and the Saddle Road-Daniel K. Inouye Highway junction to the west. The western third of the project area comprises a roughly 8,000-acre area which extends towards the western PTA boundary and southwest of the Ke‘āmuku Maneuver Area.

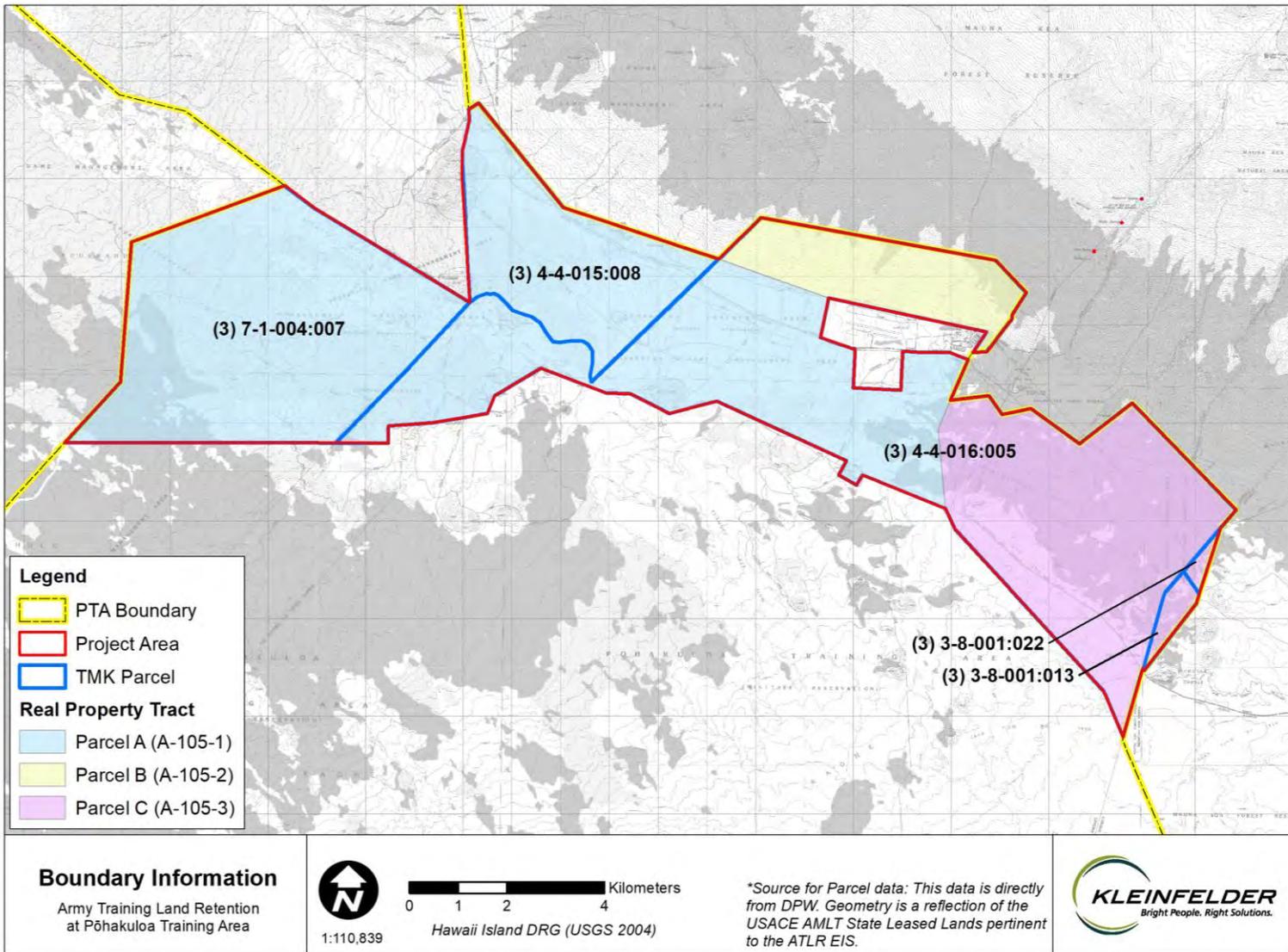


Figure 3. Project area showing TMK and Real Property Tract parcel boundaries.

The lands surrounding PTA include federal, State-owned, and private lands. Land use in the area includes cattle grazing at Parker Ranch, a residential subdivision at Waiki‘i Ranch, and undeveloped lands owned by the state of Hawai‘i and Kamehameha Schools.

#### **1.4 Definition of Historic and Cultural Resources**

NEPA analysis considers impacts to “unique characteristics of the geographic areas such as proximity to historic or cultural resources” [40 CFR Section 1508.27(b)(3)] as well as “the degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places [NRHP] or may cause loss or destruction of significant scientific, cultural, or historical resources” [40 CFR Section 1508.27(b)(8)]. Potential impacts to the relationship of people to their environment (40 CFR Section 1508.14) include cultural and historical resources [40 CFR Section 1508.1(g)(1)].

Most resources that are cultural or historical in nature are defined by several federal laws as historic properties under the National Historic Preservation Act (NHPA) (districts, sites, buildings, structures, or objects eligible for, or listed in the NRHP); as archaeological resources as defined by the Archaeological Resources Protection Act of 1979 (ARPA); or human remains (iwi kūpuna) and cultural items as defined by the Native American Graves Protection and Repatriation Act (NAGPRA). Cultural resources considered in this document, therefore, include those associated with Traditional Hawaiian and historical items and sites, buildings and structures, and other physical remains.

## **2.0 BACKGROUND**

The following background information establishes the environmental and historical setting of the project area. This information provides a contextual framework for assessing current conditions and conducting an environmental analysis for the project EIS.

### **2.1 Environmental Context**

PTA is located in the arid Saddle Region of the island of Hawai‘i, between Mauna Kea and Mauna Loa volcanic mountains, extending over an area approximately 44,055 hectares (170 square miles). The Saddle Region is characterized by fairly level, undulant lava flows marked by pu‘u (cinder cones). Elevations within the project area range from approximately 4,200 feet above mean sea level (amsl) in the west to approximately 7,700 feet amsl in the northeast along the southwestern slope of Mauna Kea. Annual rainfall in the region ranges from 43 to 56 centimeters (Giambelluca et al. 2013).

The geology of the project area is comprised mostly of older (300,000 to 11,000 B.P.) lava flows (Laupahoehoe Volcanics) originating from Mauna Kea partially overlain with more recent (5,000 to 180 B.P.) pāhoehoe and a‘a flows (Kau basalt) originating from Mauna Loa (Sherrod et al. 2007) (Figure 4). These lava flows created a variety of geologic features that were utilized by Native Hawaiians, particularly lava tubes and blisters. Lava tubes are linear cavities under solidified lava that are the result of underground rivers of molten lava, while lava blisters are “small, steep-sided swellings that are hollow and raised on the surfaces of some basaltic lava flows [and are] formed by gas bubbles pushing up the lava’s viscous surface” (Parker 1997:146). Collapsed lava tubes and blisters were conducive for human habitation, storage, and shelter.

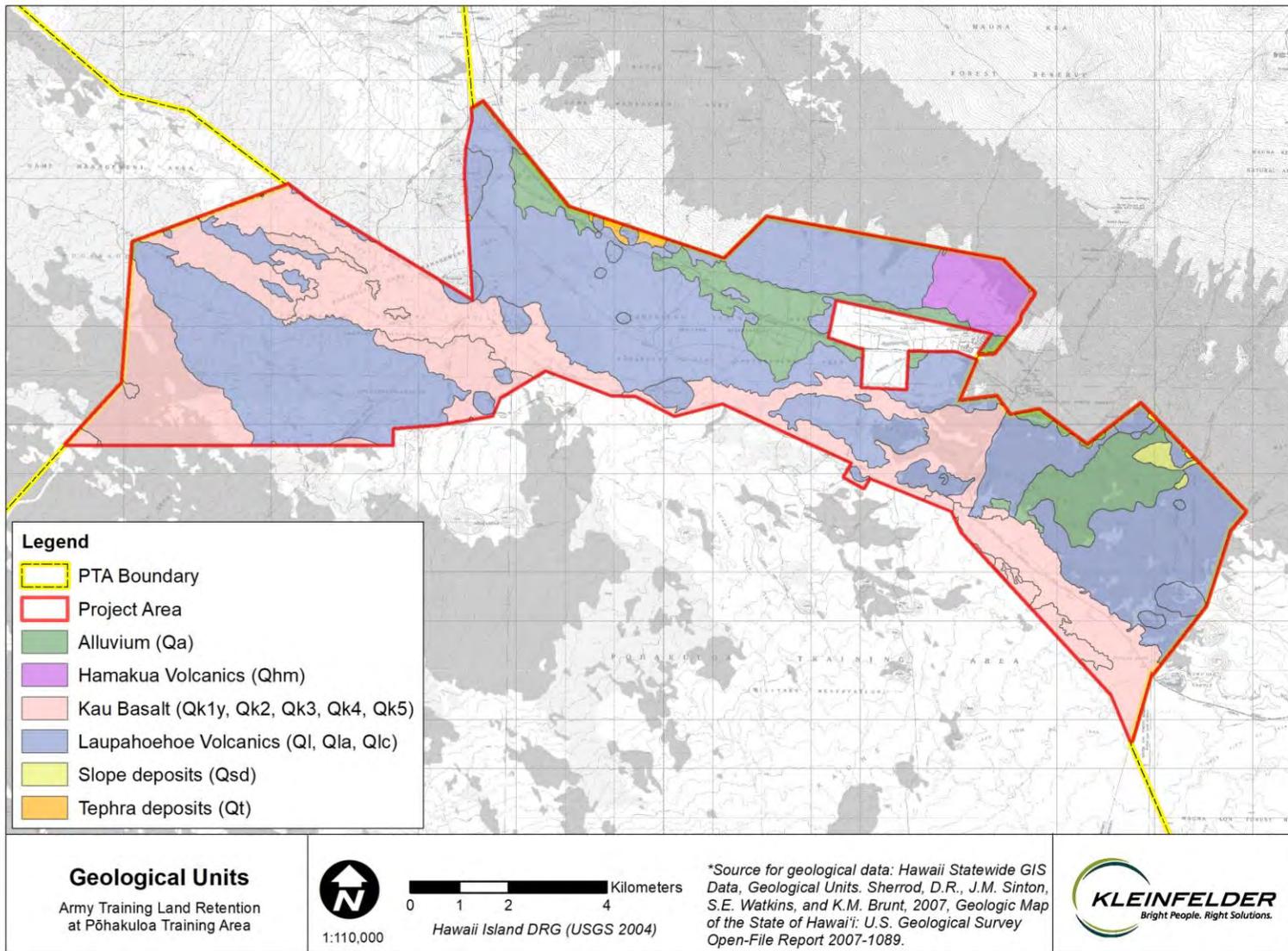


Figure 4. Geological units within the project area.

Pāhoehoe flows provided rocks suitable for construction of Traditional Hawaiian architectural features (e.g., platforms, terraces, and cairns), as well as ranching features (e.g., boundary walls, fence-lines, enclosures) and recent military features (e.g., cairns, C-shapes, walls, and related construction for defensive positions).

Some pāhoehoe flows such as the Kau basalt series formed surface chills of volcanic glass that were utilized as lithic quarries by Hawaiians. Sinton (2004) describes the processes by which the flow is formed:

The flow field is a complex of individual flow lobes that range in character from brown-weathering areas with only very thin glass crusts, to blue-black-weathering units that are characterized by conspicuous glass surface crusts ranging up to ~3cm in thickness. It is within the latter units that specific areas were exploited as glass quarries. The black-weathering units are very dense pāhoehoe, typical of that which has degassed during transit in lava tubes and subsequently oozed out down slope....The quarried lava is a basalt with scattered micro-phenocrysts of olivine ranging up to ~1mm in size.

Soils within the project area are generally comprised of weakly developed series, supporting a vegetation community classified as montane dry and mesic forest grading to subalpine forest and shrubland. According to Shaw (1997:10) vegetation at PTA “is a complex mosaic of plant communities directly related to the type and age of the substrate and subsequent amount of soil development.” Younger flows are relatively barren, supporting only limited vegetation such as ‘ohi‘a lehua (*Metrosideros* spp.), while older flows with more developed soils support grasses, small trees, and shrubs, such as māmane (*Sophora chrysophylla*), naio (*Myoporum sandwicense*), pūkiawe (*Leptecophylla tameiameiae*), a‘ali‘i (*Dodonaea viscosa*), and ‘āweoweo (*Chenopodium oahuense*) (Shaw 1997:10; Juvik and Juvik 1998:125–126).

## 2.2 Traditional Hawaiian Land Use

Pre-Contact Hawaiians generally favored coastal and lower valley locales for habitation. Traditional land use centered on agricultural production, coastal exploitation of marine resources, and the collection of wild plants and animals (Kirch 1985:2–3). Agricultural intensification accounted for a wide variety of cultigens, the two most prolific being kalo (*Colocasia esculenta*, taro) and ‘uala (*Ipomoea batatas*, sweet potato). Kalo was grown across the islands but particularly within irrigated pond fields along river valleys. Sweet potato was grown primarily in drier areas or those not typically favorable to wetland farming. Other important cultigens included pia (*Tacca leontopetaloides*, arrowroot), ti (*Cordyline terminalis*), niu (*Cocos nucifera*, coconut), mai‘a (*Musa paradisiacal*, banana), and kō (*Saccharum officinarum*, sugarcane). The exploitation of coastal marine resources was equally important and centered on fishing, the collection of limu (various seaweed species), marine invertebrates, salt production, and aquaculture.

The mauka areas beyond the limits of agriculture also provided a wide range of natural resources. While specific information regarding traditional land use of the Saddle Region is extremely limited, ethnohistoric information can be inferred from data collected from previous archaeological work conducted in the region (Maly 1999). While the arid environment, high altitude, lack of reliable water sources, and scarce cultivable land within the region discouraged use of the area for permanent settlement, radiometric assays from archaeological excavations indicate use of the region soon after settlement of the island of Hawai‘i as early as AD 1000–1200, with intermittent

visits occurring by AD 1200–1300 (Athens and Kaschko 1989; Haun 1986; Shapiro and Cleghorn 1998). Early use of the area likely involved short-term, low-impact visits by small groups of Hawaiian specialists who used the area to gather wild fauna, hardwood for tool use and canoe making, and wild plants for subsistence, medicinal, and ceremonial purposes.

Archaeological evidence suggests that many of the site types identified within PTA may be associated with travel corridors through the region (Robins et al. 2006; Shapiro et al. 1998; Williams 2002). Travel routes through the Saddle Region have been identified in ethno-historical documents that connected Traditional Hawaiian settlements (e.g., Kona, Waimea, and Hilo) and led to the Mauna Kea adze quarry and places of ceremonial and cultural importance (Byerly et al. 2014; Cordy 2000). Two of the Saddle Region’s main trails are referenced in the 1873 Boundary Commission testimonies as “Chief ‘Umi’s trails” (Cordy 2000:210) (Figure 5). Native historian Samuel Kamakau (1992:18) noted ‘Umi-a-Liloa’s use of trails for traveling through the Saddle during times of war:

“Umi went by way of the mountains to stir up fight with I-mai-ka-lani and the chiefs of Kona. He became famous as a chief who traveled through the mountains of Hawaii, and (its trails) became the routes by which he went to war.”

Resource gatherers and travelers through the area found shelter in lava tubes, blisters, overhangs, and, to a lesser degree, small C-shaped surface structures that were typically found near the travel corridors (Athens and Kaschko 1989; Cordy 1994:206; Hommon and Ahlo 1983; Streck 1992:102). Occupation and use of these shelters were likely confined to short-term stays, although these groups likely established repeated-use camps while exploiting resources (Reinman and Schilz 1993:116–118).

Sociopolitical changes during AD 1400–1650 included the expansion of dryland agriculture and the development of territorial land divisions (e.g., ahupua‘a) which coincided with a surge in population growth (Kirch 1985). Pre-Contact activity in the Saddle Region increased around AD 1400–1450 (Athens et al. 1991); by AD 1450, there was a dramatic increase of production at the Mauna Kea adze quarry to mine the highly valued volcanic glass and fine-grained basalt (Williams 2002).

Increased use of the Saddle Region may also be related to the capture of birds whose feathers were increasingly used as tribute items (Athens et al. 1991:81–82). The plumage of the ‘ō‘ō (*Moho nobilis*), ‘i‘iwi (*Vestiaria coccinea*), and ‘apapane (*Himatione sanguinea*) provided colorful feathers, a particularly potent symbol of chiefly power. Goods ornately decorated with feathers were a direct measure of a chief’s power and influence, including ‘ahu ‘ula (feathered capes), mahiole (helmets), and akua hulu manu (feathered gods) (Valeri 1985:246). According to Emerson (1885, in Welch 1993:26), the collection of bird feathers was done by a specialist known as a kia manu, who captured a bird using a pole with a sticky gum-like substance derived from the pāpala kēpau (*Pisonia umbellifera*) or ‘oha (*Delissea rhytidosperra*) plants. Although some of the birds with fewer colorful feathers survived the plucking, the ‘i‘iwi and ‘apapane were inevitably cooked and eaten, having not survived the extensive plucking of their abundant red plumage (Buck 2003:217–218). The ground-nesting pueo (*Asio flammeus sandwichensis*, Hawaiian owl), although considered an ‘aumakua (family or personal god) by many Hawaiians, were also captured for their plumage which was commonly used in the making of feather kāhili (feather standard, symbolic of royalty) (Malo 1971:38).

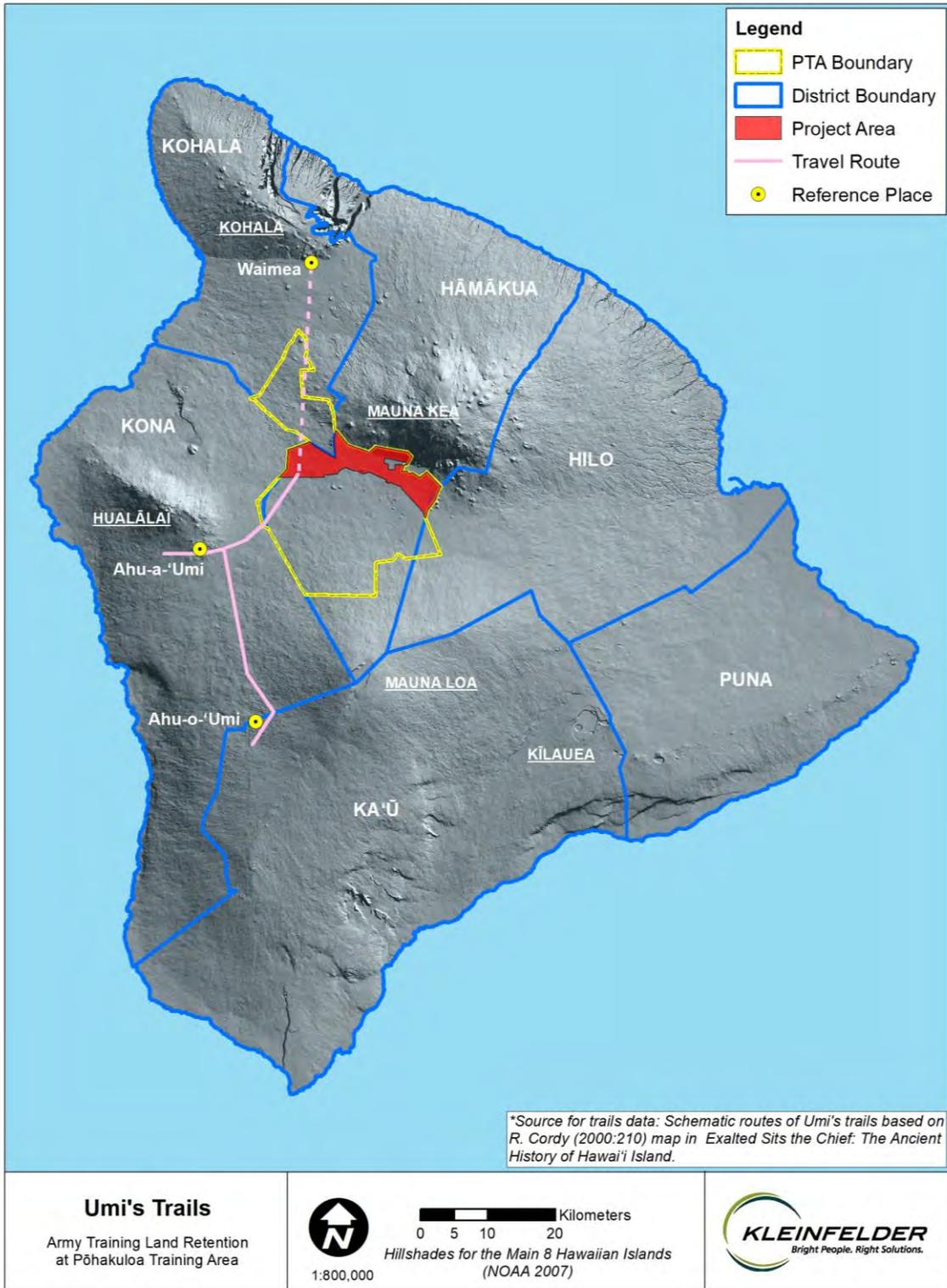


Figure 5. Map of the island of Hawai'i showing schematic routes of 'Umi's trails, adapted from Cordy (2000:210).

A number of bird species that habituated the Saddle Region were consumed by Hawaiians, particularly the larger nēnē (*Branta sandvicensis*, Hawaiian goose) and ‘ua‘u (*Pterodroma sandwichensis*, Hawaiian petrel). A post-Contact native testimony discussing the upland boundaries of Waikōloa Ahupua‘a claimed that nēnē and ‘ua‘u were hunted beyond Waikōloa in neighboring Ka‘ohe and the Saddle Region (Records from Proceedings of Boundary Commission, in Maly and Maly 2002:87). Malo (1971:37) reported that nēnē were often captured in the uplands during their molting season for food and feathers, the latter of which was used in the making of kāhili (Malo 1971:37).

The ‘ua‘u were seasonally hunted in the Saddle Region and were considered a high value food resource, especially for the adze makers visiting the quarries on the Mauna Kea summit (McCoy 1986; Williams 2002; Ziegler 1994, 2003). As a subsistence resource, Moniz (1997) suggests Hawaiians may have favored seabirds over land birds due to their large size and predictable behavioral patterns that made them an easier target to catch. A mid-nineteenth century account stated the residents of Ka‘ohe Ahupua‘a had the “sole privilege of capturing the ‘ua‘u, a mountain-inhabiting sea-fishing bird” (Lyons 1875:111, in Hommon and Ahlo 1983:21). Petrel fledglings were also reportedly procured for the ali‘i (Athens et al. 1991:81–82). Juvenile ‘ua‘u were extracted from their burrows with a long stick used to pierce the bird’s down feathers:

It is said the years ago the nesting of the uuau were considered a great delicacy, and were tabooed for the exclusive use of the chiefs. Natives were dispatched each season to gather the young birds which they did by inserting into the burrows a long stick and twisting it into the down of the young which were then easily pulled to the surface. [Henshaw 1902:102]

Hawaiians also captured the ‘ua‘u with nets as the birds flew up to the mountains in the evening (Handy et al. 1972:259). The birds were cooked by broiling their carcasses over hot stones or coals, or the birds were “cooked in ti leaves with young taro leaves (lu‘au) and stems (haha)” (Handy et al. 1972:259). Food items, including birds, were also cooked from the inside out, as described by Buck (2003:18):

The boiling method used throughout Polynesia consisted of applying heat from the inside instead of from the outside. The food was placed in wooden bowls with water, into which red hot stones were dropped. Heated stones termed ‘eho were also placed in the interior of the fowls.

An 1891 map by C.J. Lyons referred to the historic survey station Nā‘ōhule‘elua on the western boundary of Ka‘ohe Mauka Ahupua‘a as being the “scene of battle between Kona and Hāmākua bird-catchers” (Figure 6), thus suggesting territorial conflicts between traditional bird catchers in the Saddle Region. Nā‘ōhule‘elua, and an ahu that marks it, was named for two bald men from Waimea and Kona who met on the road at this place (Emerson 1885). One may surmise the two men were the embattled bird catchers mentioned on Lyons 1891 map. At the turn of the twentieth century, it was noted the ‘ua‘u once “nested in great numbers in the lava between Mauna Kea and Mauna Loa,” but the nesting sites were no longer occupied after being invaded by the introduced mongoose (Henshaw 1902:120).



### 2.3 Early Post-Contact Accounts

During the early post-Contact era, Waimea and Kawaihae continued to be the primary population centers of the region, with a sizable fishing village maintained at Puakō on the shoreline south of Kawaihae. The upland settlement of Waimea contained prime agricultural lands that provided crops to the Kawaihae settlement and foreign voyagers arriving at the busy leeward port. Menzies (1920:55–56) described the cultivated lands of Waimea from afar:

I saw in the verge of the woods several fine plantations, and my guides took great pains to inform me that the inland country was very fertile and numerously inhabited. Indeed I could readily believe the truth of these assertions, from the number of people I met loaded with the produce of their plantations and bringing it down to the water side to market, for the consumption was now great, not only by ship but by the concourse of people which curiously brought into the vicinity of the bay.

Between approximately 1815 and 1826, ‘iliahi (*Santalum* spp., sandalwood) was actively harvested in the upland forests of the Hawaiian Islands for export to China (Cuddihy and Stone 1990:38). ‘Iliahi was a desirable export as the trees were plentiful, could be harvested year-round, and did not have to be cultivated. The maka‘āinana (commoners) were forced to labor in the upland forests for days or weeks to satisfy their chiefs’ growing debts to the King and foreign entrepreneurs (Kamakau 1992:252; McGrath et al. 1973:18). Thousands of trees were taken from the upland slopes of Kohala and Mauna Kea and transported by foot to Kawaihae for shipping to Honolulu and beyond. A Native testimony described the boundary of Waikōloa bordering Ka‘ohe Mauka Ahupua‘a on the west and speaks of cutting sandalwood in the region:

Kiai, sworn: ...Puuhinai is a slight rise in the pili lands, a low hill...Keamuku is a lava field quite near Puukapele. Hanaialii is two miles perhaps from Keamuku. Puuhinai is about the same distance from Hanaialii. There is no road nor any gulches on the boundary. I know no gulch between Hanaialii and Puukapele. There is a gulch of Waikii and one of Palihai, but they are not near the line. These gulches join at Naamana or Namahana. The same gulch runs to the sea at Puako, runs through Waikoloa... I am well acquainted with that part of the boundary and the rest of it also. I have travelled the whole line personally. Used to hunt for uwau and neenee [nēnē], and to cut sandal wood in that part of the country... [Records from Proceedings of Boundary Commission, in Maly and Maly 2002:87]

The overharvesting of ‘iliahi would soon exhaust the resource, leaving the upland regions deforested. By the 1840s, the ‘iliahi forests had been completely depleted to the point that only saplings remained (Wilkes 1845:217, in Clark 1983:48).

In 1823, British missionary William Ellis toured the island of Hawai‘i in search of suitable areas in which to establish churches. In his journal, Ellis (1984:3–4) noted the sparse settlement of the uplands and, of particular interest, included accounts of Native Hawaiians who traveled into the mountain lands.

There are few inland settlements on the east and north-west parts of the island, but, in general the interior is an uninhabited wilderness. The heart of Hawaii, forming a vast central valley between Mauna Roa, Mauna Kea, and Mauna Huararai, is almost unknown, no road leads across it from the east to the western shore, but it is reported by the natives who have entered it, to be "Bristled with forests of ohia," or to exhibit vast tracts of sterile and indurated lava.

Early historic accounts provide some insight into the remoteness of the Saddle Region and the difficulties foreigners had while traveling across the Saddle. Hommon and Ahlo (1983:27) provide a summary of historic accounts that suggest the Saddle Region contained a scarcity of well-defined trails and those that existed were difficult to follow even with Hawaiian guides present (Hommon and Ahlo 1983:28). As accounted by J.S. Emerson in his survey field book on December 8, 1885, during his journey from Waimea through Ke‘āmuku to the Judd Trail near Ahu a ‘Umi, located on the southwest corner of the Saddle, the arid and rocky landscape was an added challenge for Western travelers:

The terminus of the Judd Road among the other points is carefully located. No expedition which I have ever conducted has caused me such anxiety and has attended with such loss as this. It was a frightful trip, the remembrance of which haunts me. The water holes were dry and the country parched with drought. At Waimea we encountered a cold storm of wind and rain. At Keamuku the animals drank too freely of bad water. Used up with hunger, thirst, cold and improper drink, they fell by the way. Though I did my best to save them, I lost my poor old horse at Waimea and left the old Waawaikinaauao to die on the flow of 1859 along with a mule belonging to my man. [Emerson 1885]

## **2.4 The Māhele and Land Tenure Change**

In 1848, the Māhele ‘Āina (division of lands) instituted a change from the Traditional Hawaiian system of land tenure to a system based on the western concept of fee simple ownership. During the Māhele, the Hawaiian chiefs and konohiki (headman of an ahupua‘a) were required to present their claims to the Land Commission and receive awards for the lands quit-claimed to them by Kamehameha III. Until an award for these lands were issued, the title remained with the government. A Land Commission Award (LCA) gave complete title to the lands except for the government’s right to commutation. Upon satisfaction of the commutation, which could be settled by cash payment or through the exchange of land of equal value, a Royal Patent was issued by the minister of the interior. A Royal Patent quit-claimed the governments’ interest in the land and served as proof that the government’s right to commutation no longer existed.

The Kuleana Act of 1850, sometimes referred to as the “Second Great Māhele,” bolstered private land ownership even further by permitting maka‘āinana to own land as well as foreign-born individuals. The restrictions within the Kuleana Act, however, made it difficult for commoners to receive a land award. The Act also discouraged Hawaiians who did not actively cultivate the land. The Act of August 10, 1854, later dissolved the Land Commission and stated, “a Land Commission Award shall furnish as good and sufficient a ground upon to maintain and action for trespass, ejectment, and other real action, against any persons or persons, whatsoever, as is the claimant, his heirs of assigns, has received a Royal Patent for the same” (Chinen 1958:14). An LCA recipient was thus still protected if they had not received a Royal Patent (Chinen 1958:13–14).

Overall, the Māhele and subsequent land ownership regulations marked a key shift in Hawaiian land use history and ushered in a drastic transformation from a redistributive economy to a market-based system. This facilitated the rapid decline of native land tenure and led to the widespread purchase of land by wealthy foreign investors.

### 2.4.1 LCA and Kuleana Claims within Project Area

The majority of the project area is located within the ahupua‘a of Ka‘ohe Mauka, with a small portion of the project area extending into the ahupua‘a of Humu‘ula. It is important to note that Ka‘ohe Mauka is a modern ahupua‘a designation that has divided the traditional ahupua‘a of Ka‘ohe into two separate areas; Ka‘ohe Mauka is not named in the Māhele or listed in the LCA Indices.

In 1848, Ka‘ohe Ahupua‘a was held by Victoria Kamamalu, who relinquished the land to Kamehameha III (Buke Māhele 1848:5–6). Later that same year, Kamehameha III gave Ka‘ohe to the government land inventory (Buke Māhele 1848:191). There were four kuleana claims registered by native tenants within Ka‘ohe, of which only one award was granted (Table 1). Koolau was granted one ‘āpana of seven acres under LCA 3705B. The LCA testimony indicates kalo, arrowroot, banana, and coffee were cultivated on the parcel. This parcel was likely located north of Mauna Kea at lower elevations where the modern boundary of Ka‘ohe Mauka Ahupua‘a is delineated.

Like Ka‘ohe, Humu‘ula Ahupua‘a was also held by Victoria Kamamalu in 1848, who relinquished it to Kamehameha III (Buke Māhele 1848:5–6). Kamehameha III later retained Humu‘ula as part of the Crown Land inventory (Buke Māhele 1848:190–191). One kuleana claim in Humu‘ula was registered but not awarded (Maly and Maly 2005:269).

*Table 1. Kuleana Claims for Ka‘ohe Ahupua‘a*

<i>LCA Number</i>	<i>Claimant</i>	<i>Awarded</i>	<i>Description</i>
3705B	Koolau	1 ‘āpana, 7 acres	Kalo, arrowroot, banana, and coffee
3722B	Keopohaku	Not awarded	-
8297	Kookooku	Not awarded	-
10180	Malao, Tatina	Not awarded	-

## 2.5 Historic Period Land Use

Concurrent with the declining ‘iliahi (sandalwood) trade, the ranching industry soon came to dominance in the Saddle Region, supplying a growing foreign population in the Hawaiian Islands with meat, tallow, hides, and wool. The rocky, arid landscape, inconducive to commercial agriculture, eventually gave way to U.S. military use of the area by the 1930s, which has continued into the modern period.

### 2.5.1 Cattle and Sheep Industry

Ranching has a long history on the island of Hawai‘i, traced back to the introduction of cattle and sheep in 1793 when the English Captain George Vancouver presented Kamehameha I a gift of seven longhorn cows and four sheep (Brennan 1974:23). Vancouver returned the following year bringing goats and geese, as well as more cattle and sheep. These first cattle were the personal property of Kamehameha I and initially had little economic impact (Desilets et al. 2017:9). To ensure the cattle had a chance to propagate, Kamehameha I instituted a kapu (prohibition) stipulating cattle were not to be molested or killed, which was punishable by death (Brennan 1974:19–20).

The free roaming cattle herds reproduced rapidly in the Waimea Region and mountain slopes, and by 1802, the animals had become so feral “that none of the natives dare approach them” (Turnbull 1813:243, in Kelly 1974:44). During the ten-year-long kapu, cattle numbers increased dramatically and had an enormous impact on the environment, devouring and trampling native crops (Brennan 1974:45). Stone walls were built on a massive scale throughout the island of Hawai‘i to protect traditional homes and agricultural fields from the free roaming cattle. Large tracts of land were negatively impacted as a direct result of the cattle and sheep industries.

Kamehameha III lifted the kapu on cattle in 1815, and in a measure to control the large free roaming herds, he sanctioned the hunting of bullocks by hiring foreign hunters in 1819. One of the first bullock hunters to be authorized by the Hawaiian Kingdom was John P. Parker, the founder of the Parker Ranch (Kelly 1974:44). Parker was compensated with live cattle, from which he selected the best cattle for breeding and re-domestication to form Parker Ranch (Brennan 1974:48). Cattle started to become a significant economic resource as the bullocks were hunted for meat, hides, and tallow to supply the visiting fleets of whaling ships stopping in the islands to replenish their stores (Brennan 1974:45). Reverend William Ellis described early bullock hunting observed by his companion Mr. Goodrich after returning from a trip to Mauna Kea:

In his way down, he saw at a distance several herds of wild cattle, which are very numerous in the mountains and inland parts of the island, and are the produce of those taken there, and presented to the king, by Captain Vancouver. They were, at his request, tabued for ten years, during which time they resorted to the mountains, and became so wild and ferocious, that the natives are afraid to go near them.

Although there are immense herds of them, they do not attempt to tame any; and only advantage they derive is by employing persons, principally foreigners, to shoot them salt the meat in the mountains, and bring it down to the shore for purpose of provisioning the native vessels. But this is attended with great labour and expense. They first carry all the salt to the mountains. When they have killed the animals, the flesh is cut off the bones, salted immediately, and afterwards brought on the men’s shoulders ten or fifteen miles to the sea-shore. [Ellis 1984:402]

By the 1830s, bullock hunting was a flourishing industry with over 60 independent operators (Bergin 2004:28). The arrival of the *vaqueros* or Spanish cowboys from California in the early 1830s brought with them skilled horsemanship and advanced strategies for capturing and killing cattle. It is during this time there was a significant shift from procuring salted beef for the visiting merchant and whaling ships to hunting bullocks for just their hides and tallow (*Sandwich Island Gazette* 1836). By 1840, the unrestricted hunting of bullocks for hides and tallow effectively depleted the once numerous free roaming wild herds, forcing Kamehameha III to restore the kapu on killing bullocks for their hides alone (Langlas et al. 1999:43). During an expedition to Hawai‘i, naturalist Charles Pickering noted in his journal on January 10, 1841, the decline in wild cattle was largely due to the induction of horses and the more effective hunting methods of the experienced *vaqueros*:

Horses have been imported at a great expense, and Spaniards from N. California employed to carry on the business systematically. The consequence is that the cattle are now almost exterminated, and the few that remain are so harassed that they even seek the very summit of the mountain “to get out of the way.” [Pickering 1838–1841]

### **2.5.1.1 Parker Ranch**

Following the Māhele, John P. Parker acquired land from the Land Commission in 1847 (Desilets et al. 2017:10). In 1861, Parker acquired the pasture lands of Pā‘auhau Mauka (37,888 acres), adjacent to Kā‘ohe Mauka. The following year Parker bought Pā‘auhau Makai (8,165 acres) from C.R. Bishop. These tracts were acquired by Parker to secure unbranded cattle (many of which were the offspring of Parker Ranch cattle) wandering beyond the ranch’s immediate holdings and to thwart cattle rustling (Bergin 2004:155). Parker also obtained 640 acres at the base of Mauna Kea through his Hawaiian wife Chiefess Kipikane, granddaughter of Kamehameha I. Upon Parker’s death in 1868, the 94,000-acre ranch was divided between his two sons, John Parker II and Samuel Parker. Parker Ranch continued to flourish through the remainder of the nineteenth century, shipping many of its cattle to Honolulu for processing (Figure 7).

In 1903, Alfred Carter became the manager of Parker Ranch, with Samuel Parker still owning half of the ranch assets. John Parker II’s 50-percent interest was transferred through inheritance to John Parker III’s five-year-old daughter Annie Thelma Parker (Brennan 1974:115–117). The PTA portion of the leased land was used as pasture by Parker Ranch until about 1943, when the U.S. military began operating a camp for artillery live-fire exercises (Langlas et al. 1999:55; Maly and Maly 2005:15).

### **2.5.1.2 Humu‘ula Sheep Station**

The sheep industry in Hawai‘i emerged concurrently with cattle ranching and was prevalent by the 1840s (Langlas et al. 1999:43). During this time, the merchant William French was already raising sheep and goats in Waimea and was exporting wool by 1844 (Wellmon 1969:57). Frances Spencer and James Louzada came to Waimea in the 1850s and following the death of French, acquired his holdings with the purchase of a tract of land called Lihu‘e (Wellmon 1969:76). They raised cattle and sheep on the land and operated a store in Kawaihae (Langlas et al. 1999:44).

In 1857, Spencer purchased the leases for Ka‘ohe and Humu‘ula which extended their land holdings through the mountain lands of Mauna Kea, the Saddle, and the north slope of Mauna Loa (Maly and Maly 2005:15). In 1860, Robert Janion bought out Spencer and Louzada’s operation in Ka‘ohe and Humu‘ula after securing his own lease of the land in 1859 (Maly and Maly 2005:377–378). A year later, Janion, Spencer, Louzada, and Henry Cornell consolidated their holdings to establish the Waimea Grazing and Agricultural Company (WGAC):

This indenture made the first day of August A.D., One Thousand Eight Hundred & Sixty one, between Francis Spencer & Robert Janion, lately copartners in the Grazing business at Puuloa, Waimea, on the Island of Hawaii, under the name & Style of F. Spencer & Company, of the first part, & the Waimea Grazing & Agricultural Company of the other part. Whereas by articles of agreement & co partnership made & entered into & concluded by & between the said F. Spencer & R.C. Janion of the one part and Francis Spencer, James Louzada and Henry Cornell copartners in another Grazing Establishment at Lihue in the District of Kohala in the said Island of Hawaii, of the other part, reciting that the said several parties & firms respectively had agreed & did thereby agree to consolidate & unite their several partnership propositions that the same should be therefore held, managed & conducted as a Joint Stock Establishment in the name style & title of “The Waimea Grazing and Agricultural Company...” [Maly and Maly 2005:377–378]



*Figure 7. Preparing cattle for loading on an approaching steamer in Kawaihae Harbor (Hawai'i State Archives online).*

The WGAC had various business interests including the hide and tallow trade, the export of salted beef, sheep production and the export of wool, and the selling of goods at company stores in Waimea (Langlas et al. 1999:44). According to Bergin (2004:231), Spencer developed three separate stations at Kalai'eha, Lahohinu, and Keanakolu around 1870. By 1873, a wagon road, likely following a Traditional Hawaiian trail and generally following the present route of the Saddle Road, was in use and provided access to the sheep station from Waimea. Traveler Isabella Bird, who visited Humu'ula in 1873, described the Kalai'eha sheep station:

There are 9000 sheep here, but they require hardly any attendance except at shearing time, and dogs are not used to herd them. Indeed, labour is much dispensed with, as the sheep are shorn unwashed, a great contrast to the elaborate washings of the flocks of the Australian Riverina. They come down at night of their own sagacity, in close converging columns, sleep on the gravel about the station, and in the early morning betake themselves to their feeding grounds on the mountains. [Bird 1998:232–233]

Three years later, in 1876, the declining WGAC sold the Humu'ula land lease and sheep station operation to James Gay who incorporated the Humu'ula Sheep Company. The company was later mortgaged to a German businessman named Hackfeld in 1885 (Bergin 2004:231). Hackfeld's holdings were managed by the Haneburg brothers who eventually purchased the Humu'ula Sheep Company in 1893. Ranch walls, many of which can be seen from Saddle Road, were laid out by A. Haneburg, station manager, and built by Japanese immigrants in 1895 (Langlas et al. 1999:45).

Samuel Parker bought a controlling interest in the Humu'ula Sheep Company in 1900 (Langlas et al. 1999:50). The purchase was a private venture and not incorporated into the Parker Ranch estate.

In 1914, Samuel Parker decided to sell the sheep operation in Humu‘ula to an anonymous buyer, A.W. Carter, representing Parker Ranch (Maly and Maly 2005:439–440). A series of 1926–1927 United State Geological Survey (USGS) quadrangle maps show a telephone line and the Saddle Road being called “Humuula-Waikii Road,” which likely served the sheep operations in the area (Figure 8). An informant in the 1930s recalled witnessing the cowboys drive sheep across the Saddle from Humu‘ula to Kawaihae for shipping to Honolulu (Langlas et al. 1999:53):

We used to bring the sheep down in the afternoon from Humu‘ula, down to a corral they call Pu‘u Ke‘eke‘e on the right hand side of Saddle Road as you come up Pu‘u Mau, we used to put sheep in there and ride back to Humu‘ula, spend the night at Humu‘ula and leave Humu‘ula about 2:00 in the morning, ride down to Pu‘u Mau, pick up the sheep and bring ‘em down to Nohonaohae and leave ‘em at Nohonaohae.

Right where the big pasture. Then from there the sheep were brought into Waimea for about a night and then from there-down to Pu‘u Iki, halfway to Kawaihae. And then the next morning early they would take ‘em to Kawaihae and put on the boat, send to Honolulu.

By 1950, there were approximately 6,000 to 8,000 sheep and 3,000 cattle in Humu‘ula. Around 1965, the sheep operation was phased out completely after the ranch constructed a number of water ponds to run more cattle (Langlas et al. 1999:51).

### **2.5.2 U.S. Military Land Use**

In 1943, during World War II, the U.S Government constructed Kaumana Road (currently Saddle Road) to allow soldiers ease of access to the island interior in the event of a coastal attack by invading forces (Langlas et al. 1999:55). At this time, the U.S. military also established several firing ranges at Pōhakuloa as well as Bradshaw Army Airfield (BAAF) and an Army camp consisting of Quonset huts and tents (Langlas et al. 1999:55–56) (Figure 9). Following the war, Pōhakuloa was under the control of the Hawai‘i Territorial Guard until 728 acres were ceded to the Army under the Territorial Governor’s Executive Order No. 1719 for the establishment of a multi-functional military training facility. The training facility was established in 1956, which included over 116,000 acres of land under lease and ownership.

In 1964, lease agreements were reorganized, and approximately 84,057 acres (including the 55,000-acre impact area) was transferred to the Army under Presidential Executive Order No. 11167. The project area, consisting of approximately 23,000 acres between the base camp and the impact area, were leased from the state of Hawai‘i under Lease No. DA-94-626-ENG-80c. The most recent expansion to PTA was the purchase of the 24,000-acre Ke‘āmuku parcel from Parker Ranch in 2006, located northwest of the project area.

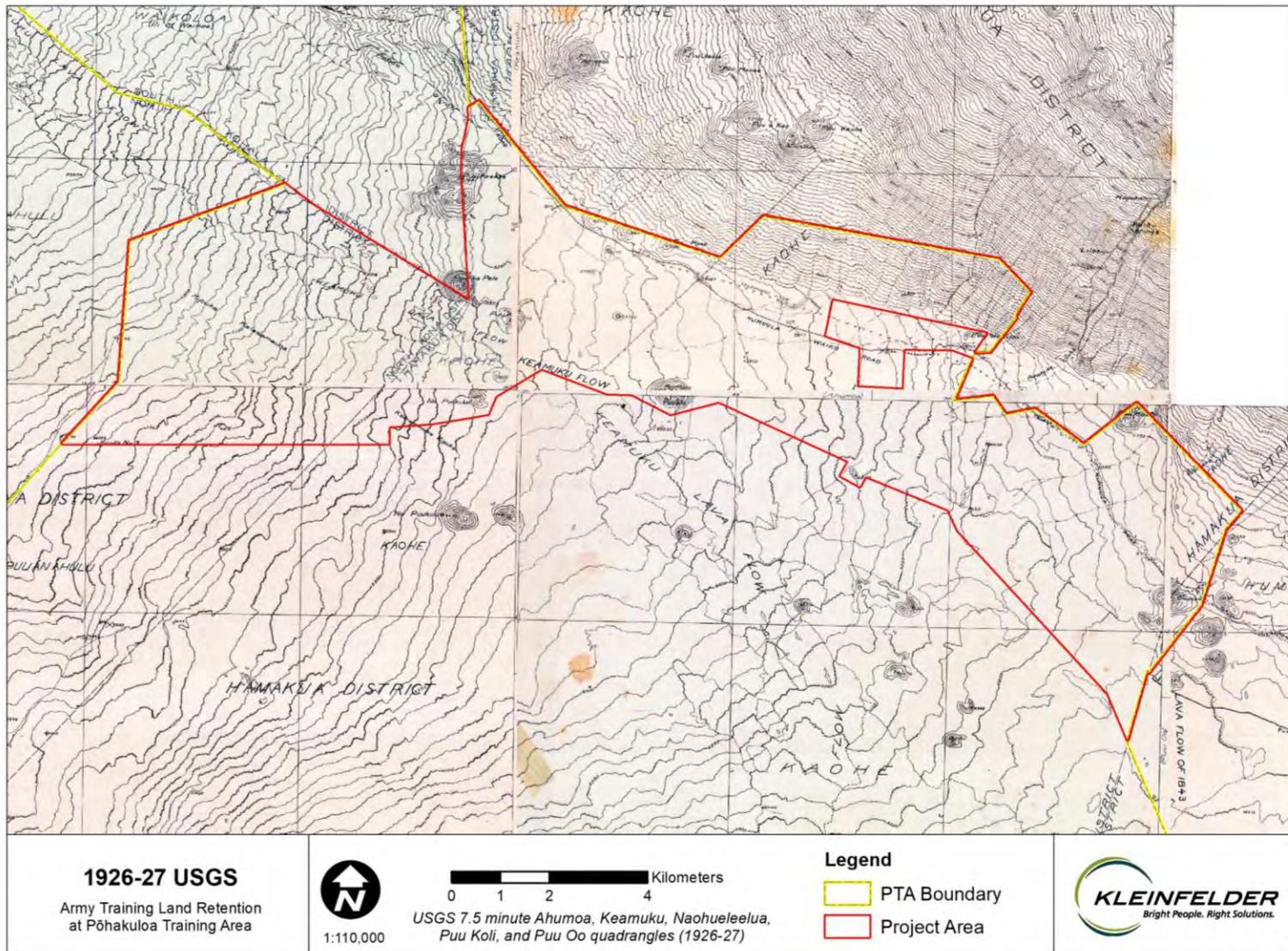


Figure 8. 1926–1927 USGS quadrangle maps showing a telephone line and Humuula-Waikii Road within the project area.

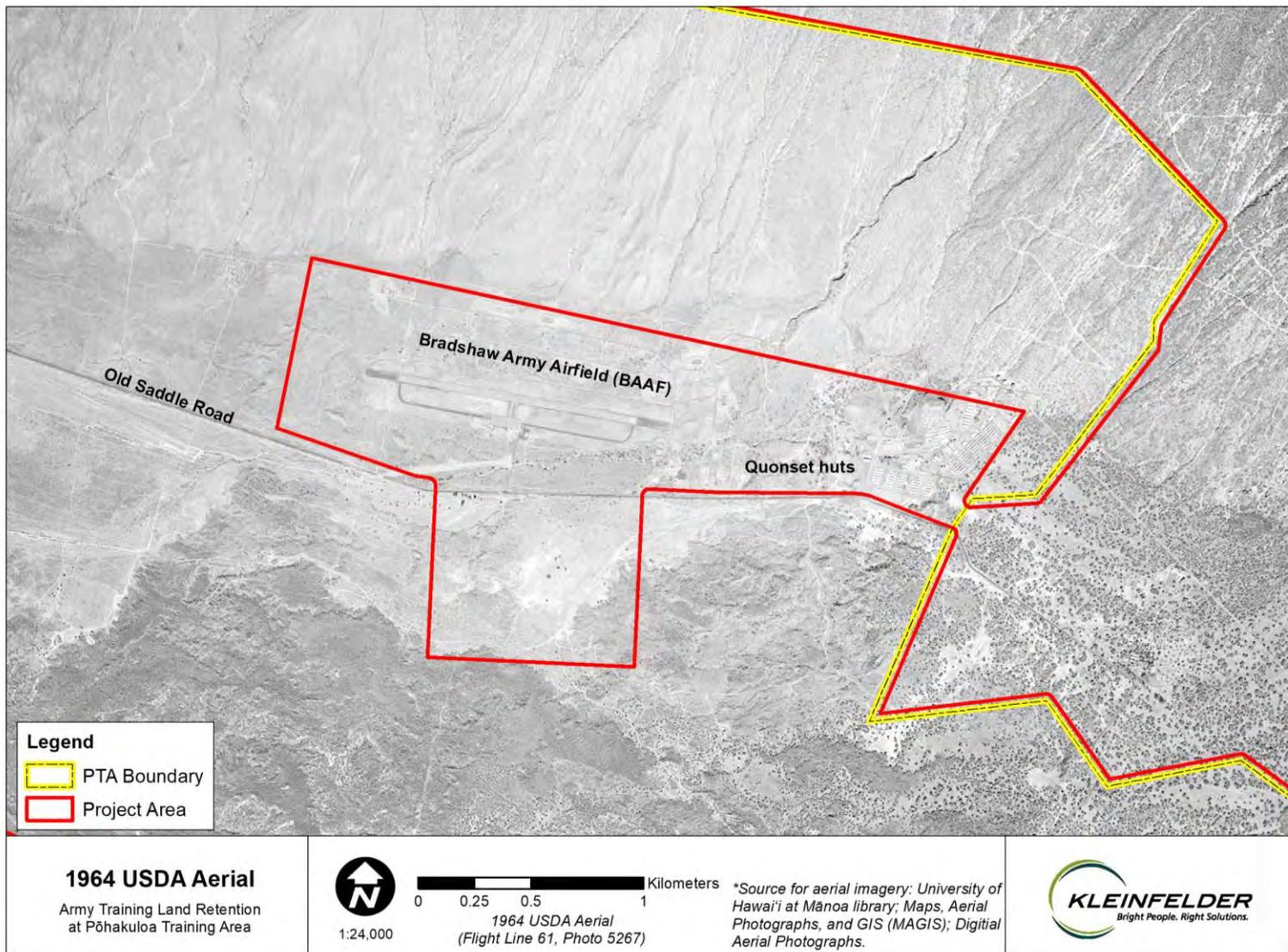


Figure 9. 1964 aerial photograph showing post-World War II developments at PTA.

### **3.0 ARCHAEOLOGICAL CONTEXT**

This section provides a summary of previously conducted archaeological studies and previously recorded archaeological sites within the project area, followed by an overview of the Traditional Hawaiian and Historic Period site types known to exist in the region. Archaeological sites are referred to using the unique portion of the Hawai'i State Inventory of Historic Places (SIHP 50-10-31-) site numbers and by temporary numbers (C-, PL-, T-) designated during surveys by consultants and PTA CRM staff.

#### **3.1 Previous Archaeological Studies within the Project Area**

PTA is well studied archaeologically and has been subjected to numerous Phase I and II inventory surveys that include portions of the project area (Figure 10 to Figure 13). Inventory surveys of PTA began in the 1960s and 1970s, supported by the Bishop Museum (Rosendahl 1977). Since the 1980s, PTA archaeologists and CRM consultants have conducted numerous archaeological investigations associated with infrastructure development projects, including the construction of roadways, firebreaks, training facilities, fence lines, an ammunitions holding area, and a tactical vehicle wash. The majority of these studies have been conducted internally by PTA CRM staff, who currently are responsible for the management of more than one hundred archaeological sites within the project area.

Several previously conducted inventory surveys within the project area have been omitted from the present discussion, as they do not meet current archaeological standards and do not count toward the Army's total survey coverage. For example, Shapiro and Cleghorn (1998) performed both intensive pedestrian and aerial (i.e., helicopter) surveys within the project area, and of their total 8,000-acre survey area, only 2,300 acres of pedestrian-surveyed land is included in the present study. Other unsurveyed portions of the project area include the steep foot slopes of Mauna Kea (in the north and northeast) and areas covered in geologically recent lava flows (in the west and south).

According to the GIS data provided by USAG-HI, these recent lava flows cover 3,546 acres of the project area and represent two eruption events, one that occurred at some point between 200 and 750 years ago and another that occurred in AD 1843 (see Figure 10 to Figure 13). The land upon which the very hazardous, sharp, young lava is present would likely not contain Traditional Hawaiian archaeological resources and have a very low probability of historic resources, since the lava would have covered any resources that may have been present prior to the flow event. In the documentation that accompanied the GIS data, USAG-HI indicated some of the previous archaeological studies included this young lava in their survey areas but once the fieldwork commenced the lava was found to be unsafe for survey:

Note, several surveys include some of this flow in the polygon on east side [of the project area], however report text says the flow was not surveyed. They counted the acreage because it was part of their project area, but it was not actually surveyed but determined unsurveyable because of safety.

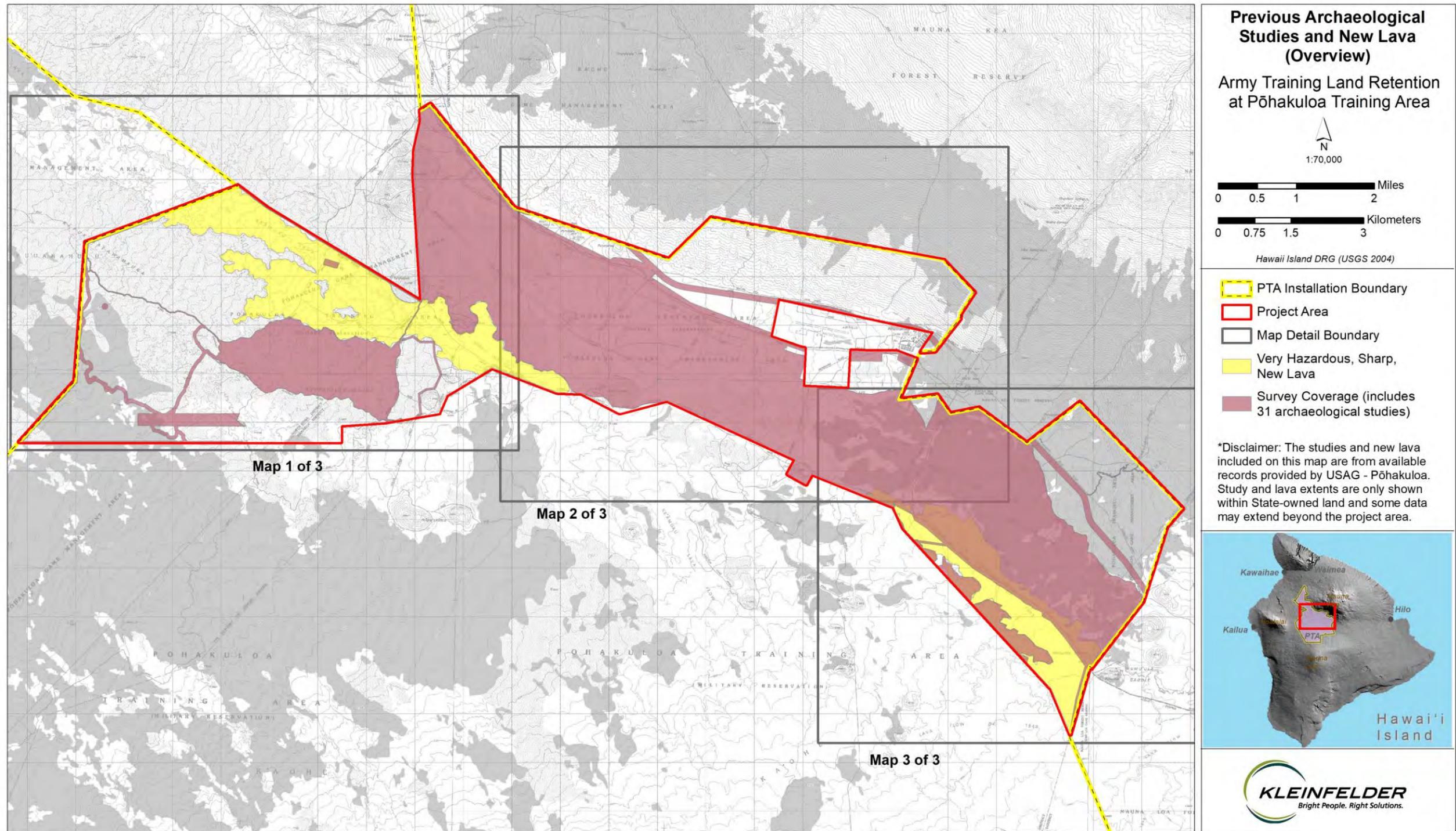


Figure 10 Overview map showing areas of new lava and survey coverage of previous archaeological studies within the project area.

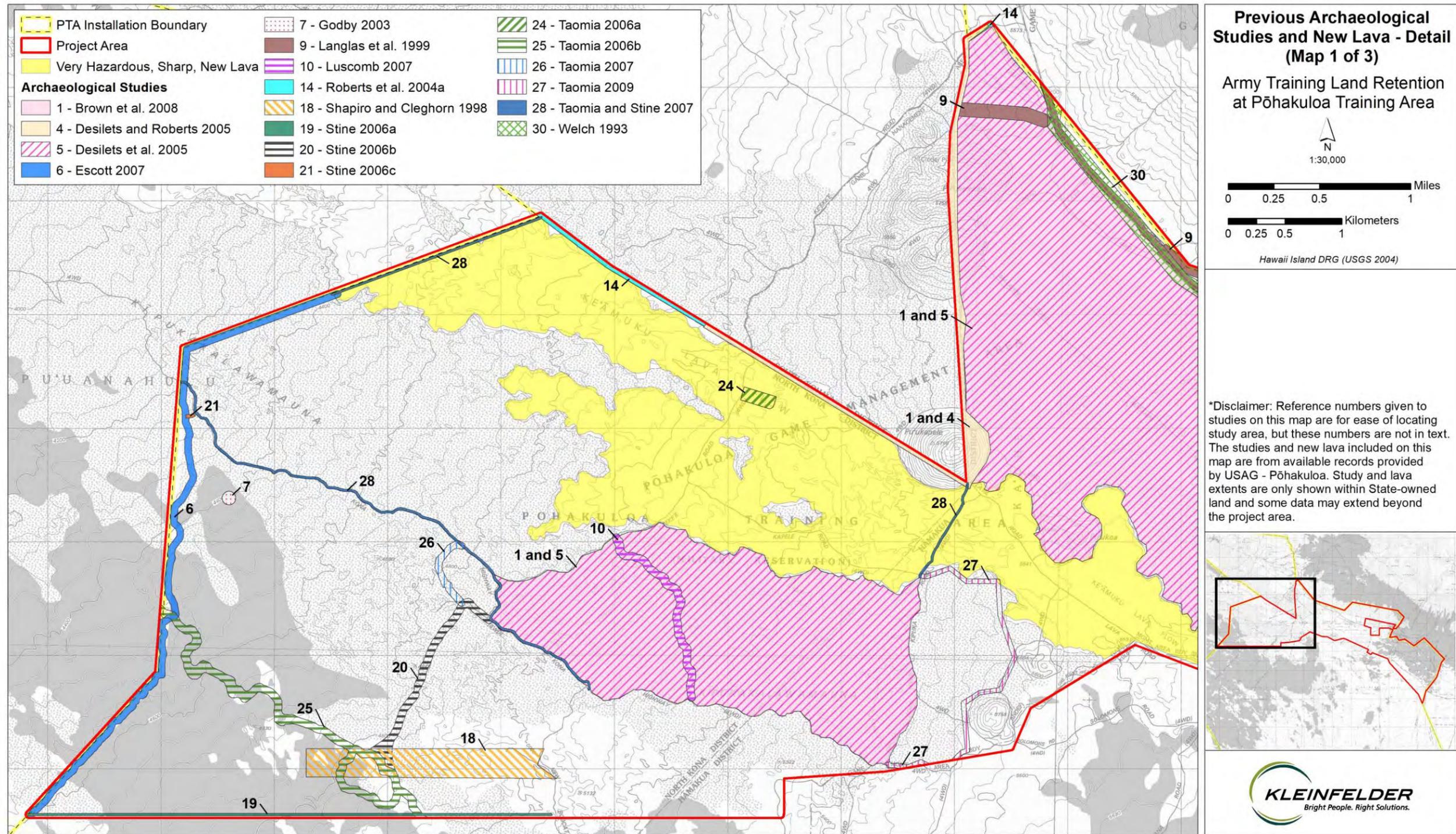


Figure 11 Detail map 1 showing archaeological studies and new lava within the project area.

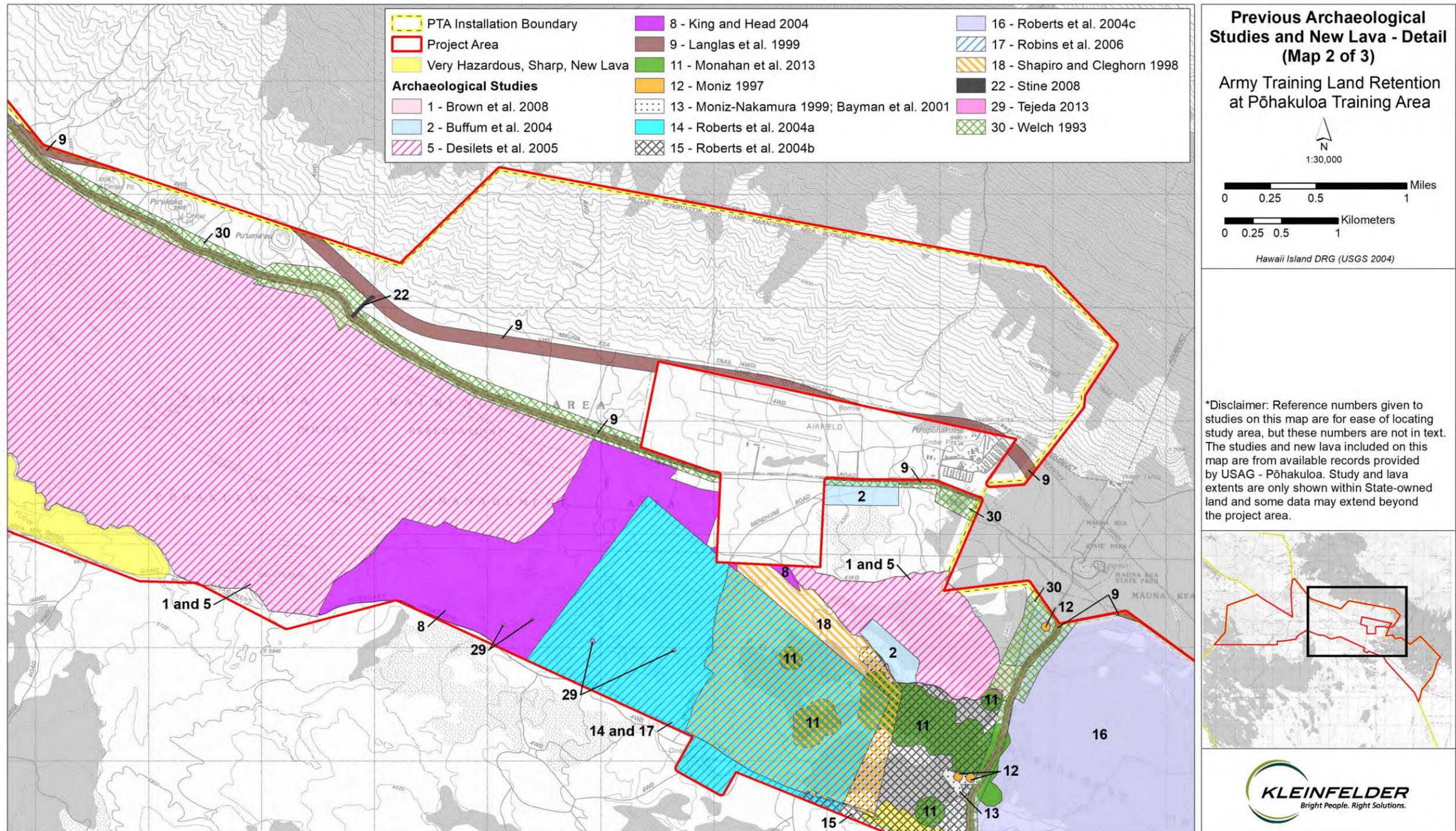


Figure 12 Detail map 2 showing archaeological studies and new lava within the project area.

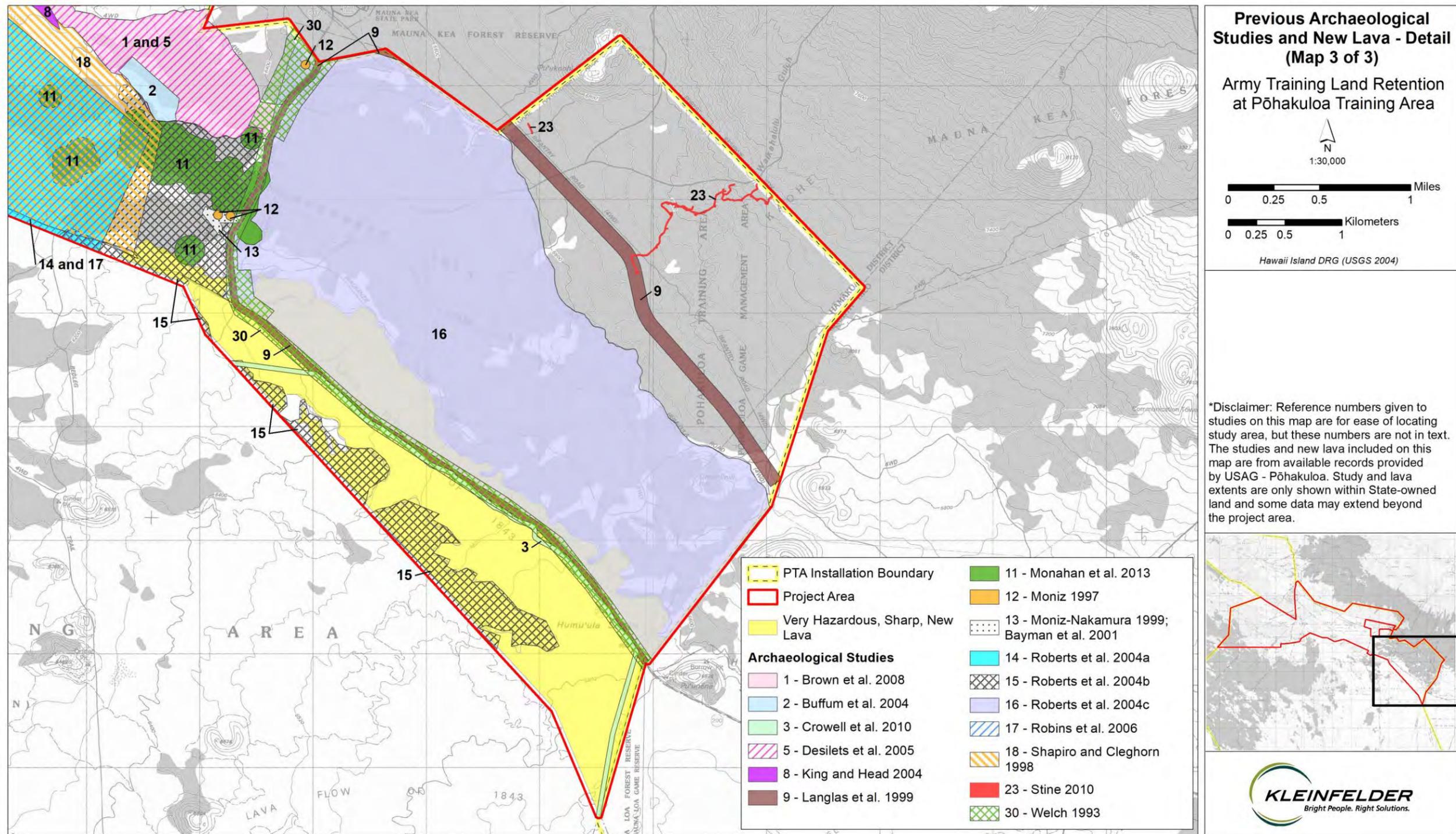


Figure 13 Detail map 3 showing archaeological studies and new lava within the project area.

### **3.1.1 PTA Cultural Resources Management Studies**

PTA CRM staff have conducted numerous archaeological studies within the project area (Table 2). Ongoing documentation of known archaeological sites is also regularly conducted by PTA CRM staff, consisting of mapping, archaeological testing, site evaluations and condition updates, and GIS documentation. These studies have been documented in various annual reports that provide project descriptions and results of the various projects.

### **3.1.2 Consultant Studies**

Cultural resources management consultants have conducted 12 archaeological surveys within the project area, beginning in the 1990s (Table 3; see Figure 11 to Figure 13). Other, less rigorous studies have been omitted from the present discussions as PTA CRM staff does not include these studies as part of the formal survey coverage of PTA.

Archaeological surveys of the Saddle Road corridor were conducted in the 1990s and included portions of the project area. An intensive archaeological survey of a 14.5-mile-long segment of Saddle Road was conducted that included portions of TAs 1, 3–9, 12, 15, and 16 (Welch 1993). During that survey, two previously recorded sites were identified within the project area including a historic rock wall (SIHP 5002) and a lava tube cave shelter (SIHP 5003). Subsurface testing was conducted at SIHP 5003 which documented cultural deposits containing charcoal, ash, faunal bone, and lithic debitage. Welch (1993:85) interpreted the site as a temporary shelter related to the procurement of lithic resources from the quarries on Mauna Kea. One new site (SIHP 14638) was identified at the edge of the survey corridor, consisting of a volcanic glass quarry with associated lithic scatters and lava blisters. In 1996, an archaeological survey was conducted of more than 187 miles of the Saddle Road corridor (including existing roadways and alternative corridors) that included portions of TAs 1, 3–9, 11, 12, 15, and 16 (Langlas et al. 1999). That study identified 13 new sites, but none were located within the project area.

In 1994, an archaeological survey was conducted within the project area that included portions of TAs 5 and 22 (Shapiro and Cleghorn 1998). Forty sites were identified or re-located during that study, consisting of 39 newly identified sites (SIHPs 19490 to 19529) and one previously recorded site (SIHP 10265). Three of these new sites (SIHPs 19490, 19509 and 19529) were identified within the project area.

The largest survey projects conducted within the project area were performed by Garcia and Associates (Brown et al. 2008; Buffum et al. 2004; Desilets and Roberts 2005; Desilets et al. 2005; Roberts et al. 2004a, 2004b, 2004c; Robins et al. 2006), which focused on Stryker Brigade Combat Team (SBCT) project areas and potential maneuver areas covering approximately 10,315 acres. Archaeological surveys were conducted for the SBCT facilities within TAs 6 and 7 (Buffum et al. 2004). No new sites were identified during that study; however, seven new pāhoehoe pit features were documented at SIHP 23455. In 2002, additional surveys were conducted within TAs 5, 7, and 21 (Roberts et al. 2004a). Five sites were identified within the project area during that study, including four new sites (SIHPs 23455, 23456, 23457, and 23462) and one previously recorded site (SIHP 19490). Archaeological surveys were also conducted within TAs 5 and 21 between 2001 and 2002 (Roberts et al. 2004b). During that study, four previously recorded sites (SIHPs 14638, 21351, 21744, and 21745) and eight new sites (SIHPs 23455, 23562, 23563, 23565, 23566, 23568, 23572,

*Table 2. Archaeological Studies Conducted by PTA CRM Staff*

<i>Reference</i>	<i>Training Area</i>	<i>Study Type</i>	<i>Summary of Findings</i>
Moniz 1997	5, 6	Survey	Two previously recorded sites (SIHPs 5003 and 14638) and one new site (SIHP 21351).
Moniz-Nakamura 1999; Bayman et al. 2001	5	Survey and Testing	Two previously recorded sites (SIHPs 5003 and 21351) and two new sites (SIHPs 21744 and 21745). Testing at SIHP 5003 documented lithic debitage, basalt tools, and bird bone. Radiocarbon dating placed SIHP 5003 within the Pre-Contact to Historic Period. Testing at SIHP 14638 recovered charcoal.
Godby 2003	22	Survey	Identified human remains at SIHP 23694.
King and Head 2004	6–8	Survey	Four previously recorded sites (SIHPs 23452, 24326, 24327, and 24328).
Stine 2006a	22	Survey	Five new sites (T-082306-01 to T-082306-05).
Stine 2006b	22	Survey	No sites identified within the project area.
Stine 2006c	22	Survey	No sites identified within the project area.
Taomia 2006a	17	Survey	No sites identified within the project area.
Taomia 2006b	22	Survey	No sites identified within the project area.
Taomia 2007	22	Survey	No sites identified within the project area.
Taomia and Stine 2007	17–20, 22	Survey	SIHP 23452 identified and flagged for avoidance.
Luscomb 2007	22	Survey	No sites identified within the project area.
Escott 2007	22	Survey	No sites identified within the project area.
Stine 2008	11	Survey	No sites identified within the project area.
Taomia 2009	18	Survey	One new site (T-031709-01).
Crowell et al. 2010	21	Survey	No sites identified within the project area.
Stine 2010	2	Survey	No sites identified within the project area.
Tejeda 2013	7	Testing and Evaluations	Testing conducted at four previously recorded sites (SIHPs 23457, 23462, 24326, and 24327). SIHP 23457 was evaluated as eligible and SIHPs 23462, 24326, and 24327 were evaluated as not eligible.

Table 3. Archaeological Studies Conducted by Consultants

<i>Reference</i>	<i>Training Area</i>	<i>Study Type</i>	<i>Summary of Findings</i>
Welch 1993	1, 3–9, 12, 15, 16	Survey and Testing	Two previously recorded sites (SIHPs 5002 and 5003) and one new site (SIHP 14638). Testing at SIHP 5003 documented cultural deposits containing charcoal, ash, faunal bone, and lithic debitage.
Langlas et al. 1999	1, 3–9, 11, 12, 15, 16	Survey	No sites identified within the project area.
Shapiro and Cleghorn 1998	5, 22	Survey	Three new sites (SIHPs 19490, 19509, and 19529).
Buffum et al. 2004	6, 7	Survey	Seven new pāhoehoe pit features were documented at SIHP 23455.
Roberts et al. 2004a	5, 7, 21	Survey	One previously recorded site (SIHP 19490) and four new sites (SIHPs 23455, 23456, 23457, and 23462).
Roberts et al. 2004b	5, 21	Survey	Four previously recorded sites (SIHPs 14638, 21351, 21744, and 21745) and eight new sites (SIHPs 23455, 23562, 23563, 23565, 23566, 23568, 23572, and 23575).
Roberts et al. 2004c	1, 3, 4	Survey	Three previously recorded sites (SIHPs 5002, 21746, and 22941) and 14 new sites (SIHPs 23842 to 23854 and 23856).
Desilets and Roberts 2005	16, 17, 20	Survey	No sites identified within the project area.
Desilets et al. 2005	6, 8, 9, 12–16, 19	Survey	Three previously recorded sites (SIHPs 23450, 23452, and 23455).
Robins et al. 2006	5, 7, 21	Survey, Testing, and Evaluations	Five previously recorded sites (SIHPs 19490, 23455, 23456, 23457, and 23462).
Brown et al. 2008	6, 8, 9, 12–17, 19, 20	Survey and Testing	Three previously recorded sites (SIHPs 23450, 23452, and 23455).
Monahan et al. 2013	4–6	Survey and Testing	Investigated previously recorded pit features.

and 23575) were identified within the project area. In 2003, Garcia and Associates conducted more surveys within TAs 1, 3, and 4 (Roberts et al. 2004c). Seventeen (17) sites were identified within the project area during that study, including three previously recorded sites (SIHPs 5002, 21746, and 22941) and 14 newly recorded sites (SIHPs 23842 to 23854 and 23856).

Survey work continued in 2003 to support the designation of SBCT Go/No Go maneuver areas within TAs 6, 8, 9, 12–16, and 19 (Desilets et al. 2005). Three previously recorded sites (SIHPs 23450, 23452, and 23455) were identified within the project area during that study. Six possible Traditional Hawaiian sites were also identified, along with dozens of likely military features. Further work was recommended at all but one site (two stone cairns designated as Site 13) to assist with determining cultural affiliation, function, age, and intensity of use.

In 2002, an archaeological survey was conducted of 1,010 acres within Ke‘āmuku Maneuver Area (Desilets and Roberts 2005), which overlaps slightly into TAs 16, 17, and 20 within the project area. Twenty sites (SIHPs 23368 to 23387) were identified during that study, but none were located within the project area.

In 2003, Phase II archaeological surveys that included subsurface testing and site evaluations were conducted within TAs 5, 7, and 21 (Robins et al. 2006). Five previously recorded sites (SIHPs 19490, 23455, 23456, 23457, and 23462) were identified within the project area. All of the sites were Traditional Hawaiian in origin and were associated with short-term habitation, lithic quarrying activities, possible seabird hunting, and travel through the region. Additional Phase II surveys were conducted between 2004 and 2005 within TAs 6, 8, 9, 12–17, 19, and 20 (Brown et al. 2008) that investigated three sites (SIHPs 23450, 23452, and 23455) within the project area.

In 2013, Cultural Surveys Hawai‘i conducted an archaeological investigation of previously recorded pit features within TAs 4–6 (Monahan et al. 2013). Monahan et al. (2013:256) determined the likely function of the pits was to enhance nesting seabird habitat based on the results of residue analysis that identified avian signals in collected soil samples.

## **3.2 Previously Recorded Sites in State-Owned Land of PTA**

PTA CRM staff are currently responsible for the management of 105 archaeological sites (Figure 14; Table 4) within the project area, and also keep track of military-associated features (foxholes, enclosures, walls, excavations, trash/ammunition scatters). Due to their recent age, military features are not included in the table or maps in this report.

### **3.2.1 Traditional Hawaiian Sites**

Traditional Hawaiian archaeological resources recorded in the project area fall into several broad site types, including temporary habitation features (lava tube caves, blisters, and overhangs, stone platforms, walls, enclosures, and C-shaped structures); excavated pāhoehoe pits, likely related to the procurement of ‘u‘au; lithic quarries; rock cairns; and trail segments.

#### **3.2.1.1 Temporary Habitation Sites**

Temporary habitation sites are typically classified as either limited-use or repeated-use sites. Limited-use sites were occupied on a short-term basis, such as an overnight stay (Streck 1992:102) in surface structures (e.g., rock-constructed enclosures) and natural shelters formed in lava flows (e.g., caves and rock shelters). The limited-use occupations are defined by sparse amounts of cultural material, often limited to charcoal scatters or shallow ash deposits, and small artifact scatters.

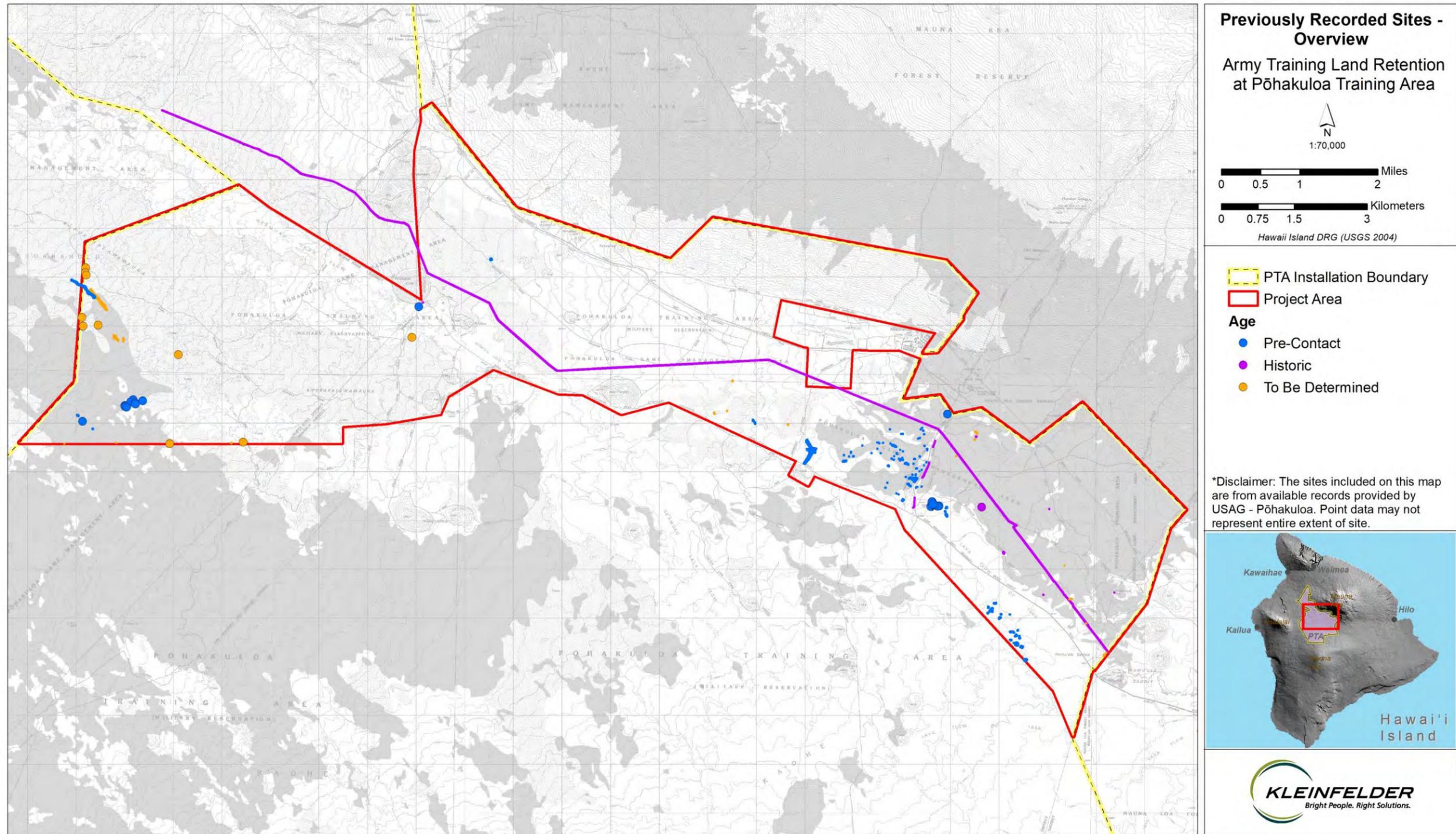


Figure 14. Overview map showing archaeological sites within the project area.

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*Table 4. Archaeological Sites within the Project Area*

<i>Site Number</i>	<i>Training Area(s)</i>	<i>Description</i>	<i>Period</i>
50-10-31-5002	5	Ranch wall	Historic
50-10-31-5003	6	Habitation lava tube	Traditional
50-10-31-5009	17	Trail	Traditional
50-10-31-14638	5	Habitation lava tubes, rectangular house foundation, artifact scatter, pavement	Traditional
50-10-31-19490	5	Habitation lava tubes, trails, C-shape	Traditional
50-10-30-19509	22	Habitation lava tube	Traditional
50-10-30-19529	22	Habitation lava tube	Traditional
50-10-31-21351	5	Lithic workshop complex	Traditional
50-10-31-21744	5	Lithic scatter	Traditional
50-10-31-21745	5	Habitation lava blister	Traditional
50-10-31-21746	4	Mound/excavation complex	Unknown
50-10-31-22941	4	Lava blisters	Traditional
50-10-31-23450	15	Habitation, overhang shelter, artifact scatter, pictographs	Traditional
50-10-31-23452	1, 3–9, 13, 14, 16, 17	Ranching fence line	Historic
50-10-31-23455	5	Pāhoehoe pits	Traditional
50-10-31-23456	5	Possible habitation enclosure	Traditional
50-10-31-23457	7	Trail	Traditional
50-10-31-23462	7	Cairn	Unknown
50-10-31-23562	5	Habitation lava tube	Traditional
50-10-31-23563	5	Modified outcrop/wall	Traditional
50-10-31-23565	5	Volcanic glass quarry	Traditional
50-10-31-23566	5	Habitation lava tube	Traditional
50-10-31-23568	5	Habitation lava tube	Traditional
50-10-31-23572	5	Habitation complex	Traditional
50-10-31-23575	5	Habitation lava blister	Traditional
50-10-30-23694	22	Lava tube and burial	Traditional
50-10-31-23842	1	Habitation platform/terrace	Unknown
50-10-31-23843	1	Enclosure/mound complex	Unknown
50-10-31-23844	1	Mound	Unknown

Table 4. (cont.)

<i>Site Number</i>	<i>Training Area(s)</i>	<i>Description</i>	<i>Period</i>
50-10-31-23845	1	Mound	Unknown
50-10-31-23846	1	Ranching enclosure	Historic
50-10-31-23847	3	Ranching alignments	Historic
50-10-31-23848	3	Mound	Historic
50-10-31-23849	4	Mound	Historic
50-10-31-23850	4	Ranch corral	Historic
50-10-31-23851	4	Habitation lava tube	Unknown
50-10-31-23852	1, 3–9, 13, 14, 16, 17	Rock wall and enclosure	Historic
50-10-31-23853	4	Habitation lava tube	Unknown
50-10-31-23854	3	Volcanic glass quarry	Traditional
50-10-31-23856	4	Pāhoehoe pits	Traditional
50-10-31-24326	7	Blister cave and pit complex	Unknown
50-10-31-24327	7	Cairn	Unknown
50-10-31-24328	7	Wall, C-shape	Unknown
50-10-31-26728	5	Habitation lava tube	Traditional
50-10-31-26729	5	Habitation lava tube blister	Traditional
C-020305-01	22	Lava tube	Unknown
C-031705-01	22	Lava tube	Traditional
C-031705-02	22	Lava tube	Traditional
C-031705-03	22	Lava tube	Traditional
C-031705-04	22	Lava tube	Traditional
C-031705-05	22	Lava tube	Traditional
C-031705-06	22	Lava tube	Traditional
PL-PTA-02	21	Volcanic glass quarry	Traditional
PL-PTA-03	21	Volcanic glass quarry	Traditional
PL-PTA-04	21	Volcanic glass quarry	Traditional
PL-PTA-05	21	Volcanic glass quarry	Traditional
PL-PTA-06	21	Volcanic glass quarry	Traditional
PL-PTA-029	21	Volcanic glass quarry and artifact scatter	Traditional
PL-PTA-030	21	Volcanic glass quarry	Traditional

Table 4. (cont.)

<i>Site Number</i>	<i>Training Area(s)</i>	<i>Description</i>	<i>Period</i>
PL-PTA-031	21	Volcanic glass quarry and artifact scatter	Traditional
PL-PTA-032	21	Volcanic glass quarry and artifact scatter	Traditional
PL-PTA-033	21	Volcanic glass quarry	Traditional
PL-PTA-034	21	Volcanic glass quarry	Traditional
PL-PTA-061	21	Volcanic glass quarry and artifact scatter	Traditional
PL-PTA-062	21	Volcanic glass quarry and artifact scatter	Traditional
PL-PTA-063	21	Volcanic glass quarry and artifact scatter	Traditional
PL-PTA-064	21	Volcanic glass quarry and artifact scatter	Traditional
PL-PTA-065	21	Volcanic glass quarry	Traditional
PL-PTA-066	21	Volcanic glass quarry and artifact scatter	Traditional
PL-PTA-067	21	Volcanic glass quarry and artifact scatter	Traditional
PL-PTA-068	21	Volcanic glass quarry and artifact scatter	Traditional
T-012805-02	22	Habitation lava tube	Traditional
T-020305-02	22	Habitation lava tube	Traditional
T-020701-02	6	Artifact scatter	Traditional
T-031709-01	18	Mound	Unknown
T-040418-01	1	USGS survey marker	Historic
T-041906-01	22	Habitation lava tube	Unknown
T-041906-02	22	Habitation lava tube	Unknown
T-041906-03	22	Habitation lava tube	Unknown
T-043094-02	22	Habitation lava tube	Unknown
T-043094-03	22	Habitation lava tube	Unknown
T-043094-04	22	Habitation lava tube	Unknown
T-043094-05	22	Habitation lava tube	Unknown
T-050906-01	22	C-shape	Unknown
T-070104-01	5	Artifact scatter	Traditional

Table 4. (cont.)

<i>Site Number</i>	<i>Training Area(s)</i>	<i>Description</i>	<i>Period</i>
T-071306-01	22	Enclosure	Unknown
T-080206-01	1	Enclosure	Unknown
T-082217-08	14	USGS boundary marker	Historic
T-082306-01	22	Cairn	Unknown
T-082306-02	22	Modified outcrop	Unknown
T-082306-03	22	Lava tube	Unknown
T-082306-04	22	Pāhoehoe pit	Unknown
T-082306-05	22	Pāhoehoe pit	Unknown
T-092202-01	3	Volcanic glass quarry	Traditional
T-092202-02	3	Artifact scatter	Traditional
T-092202-03	3	Artifact scatter	Traditional
T-092202-04	3	Artifact scatter	Traditional
T-092202-05	3	Artifact scatter	Traditional
T-092899-01	22	Habitation lava tube	Traditional
T-100606-01	22	Mound	Unknown
T-100606-02	22	Mound	Unknown
T-111402-01	3	Artifact scatter	Traditional
T-111402-02	3	Volcanic glass quarry	Traditional
T-111402-05	3	Volcanic glass quarry	Traditional
T-111402-06	3	Volcanic glass quarry	Traditional

Repeated-use sites contain midden deposits, features, and exhibit structural modifications, such as platforms, walls, terraced areas, and cupboards. Within the project area in TA 15, one habitation complex (SIHP 23450) includes a panel of at least 13 pictographs with anthropomorphic figures, an animal, and linear patterns (Figure 15). Cultural deposits at repeated-use sites are stratified and typically contain a wide range of well-preserved artifacts (Athens and Kaschko 1989; Haun 1986; Robins et al. 2006; Shapiro and Cleghorn 1998; Shapiro et al. 1998). Faunal assemblages at repeated-use sites are dominated by bird bone, particularly those of adult ‘ua‘u, though marine shell and fish bone also occur in limited quantities (Athens and Kaschko 1989; Ziegler 1994). Some repeated-use sites may represent base camps for groups exploiting resources in upland areas (Reinman and Schilz 1993:116–118).

Temporary and repeated-use habitation site types are typically located along trails running through the Saddle Region and near important upland resources, such as quarries, lava tubes with drip water sources, and bird nesting areas. Within the project area, habitation sites are generally concentrated within TAs 5 and 22. SIHP 19490 in TA 5 is comprised of several lava tube habitation features along with a trail segment, a C-shaped structure, and other archaeological features, including midden deposits, ahu, and a surface artifact scatter. In 2003, a pair of well-preserved ti leaf sandals (Figure 16) was collected from SIHP 19490 by PTA CRM staff. Within TA 22, SIHP 23694 is situated within the “C” (Charlie) lava tube cave system (Figure 17), where archaeological features and cultural materials were first identified during a biological resources survey of PTA (Godby 2003). A subsequent site visit by PTA CRM staff in 2003 documented human remains at SIHP 23694 along with an artifact scatter containing lithic debitage, water-worn stones, and gourd fragments. A circular-shaped hearth containing charcoal, ash, and bird bone was also noted near one of the cave entrances (Godby 2003).



*Figure 15. Pictograph panel at SIHP 23450, photograph from Brown et al. (2008:169).*



*Figure 16. Ti leaf sandals (ti kama 'a) from SIHP 19490, photograph from Robins et al. (2006:35).*



*Figure 17. Entrance 3C at SIHP 23694 where human remains were documented, photograph from Godby (2003:11).*

### 3.2.1.2 Excavated Pāhoehoe Pits

Excavated pāhoehoe pits are by far the most abundant feature type within the Saddle Region and have been subjected to numerous archaeological investigations. Williams (2002:26) noted the pit features typically exhibit broken ceiling slabs removed from the excavations that are stacked, piled, or merely “thrown” along the outer rim of the pits. Some pits appeared to be filled in, which Williams (2002:26) suggested might be from rocks being thrown behind the excavator (into the open pit) as the pāhoehoe shelf continues to be dismantled. He also noted the presence of deep battering scars on the pit edges that suggest the use of a heavy, pointed tool to break open the lava crust (Williams 2002:26).

Moniz-Nakamura (Moniz 1997; Moniz-Nakamura 1999) suggested the excavated pits represented efforts to create nesting habitat for ‘ua’u or to enlarge natural burrows to retrieve nestlings. Nesting burrows can be up to 1.8 meters long with 15- to 20-centimeter-high entrances; enlarging these entrances makes it easier to retrieve the nestlings from the burrow. Microfossil and organic residue analysis of sediment samples from excavated pit features within the project area was conducted at SIHP 23455 (Figure 18) in TA 5 and SIHP 23856 in TA 4 (Monahan et al. 2013).

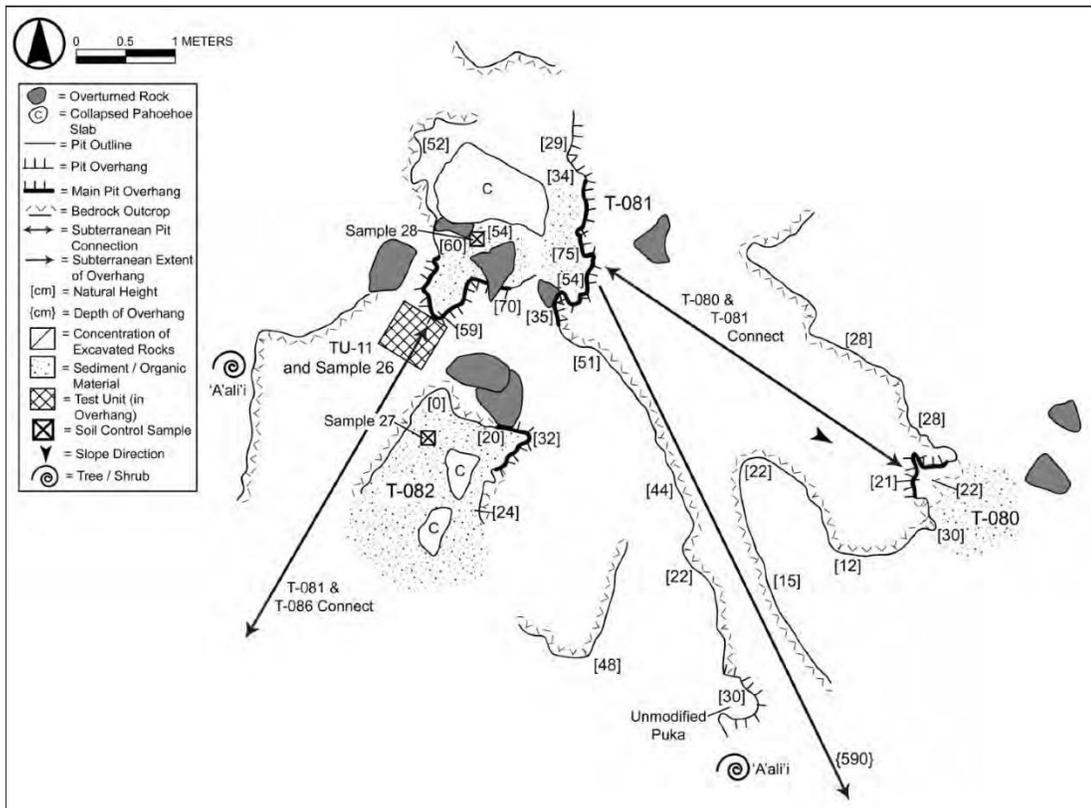


Figure 18. Plan view of pit features and excavation unit at SIHP 23455, from Monahan et al. (2013:171).

Using control samples from known petrel nesting sites on the slopes of Mauna Loa, the samples produced strong Fourier Transform Infrared Spectroscopy (FTIR) avian signatures from all sampled pits and some of the samples closely resembled the Mauna Loa samples (Monahan et al. 2013:252). However, this same signature was also found in control samples outside the pits, indicating birds were in the area but not necessarily targeting the excavated pits. Monahan also cautioned that the avian signature is general (not classified to genus or species) and could reflect the presence of birds other than seabirds that are known to use the pits during recent times (Monahan et al. 2013:250).

Moniz-Nakamura (1999) and Monahan et al. (2013) attempted to cultivate ‘uala in excavated pits; however, these experimental attempts were unsuccessful; the plants sustained green leaves for up to several months, but none produced viable tubers (Monahan et al. 2013:255).

### 3.2.1.3 Lithic Quarries

The Saddle Region is one of Hawai‘i’s most abundant volcanic glass sources. The project area’s relatively recent pāhoehoe flows contain a great number of volcanic glass outcrops, most of which have been exploited. Lithic quarries identified within the project area are generally concentrated within the eastern portion of the project area.

In addition to volcanic glass debitage, quarry sites also frequently contain fragmented and complete hammerstones, hundreds of which have been documented within the project area. Williams (2002:71) noted the use of “large hammerstones made of vesicular pahoehoe” for initial quarrying of the material and small, dense basalt hammerstones derived from Mauna Kea basalt for secondary reduction activities. While lithic scatters are commonly associated with quarried areas where primary reduction of lithic material occurred, they are also frequently documented at both repeated and limited-use occupation sites (Figure 19), representing secondary reduction to produce adze blanks, and the maintenance and production of flake tools.



Figure 19. Volcanic glass artifacts recovered from excavations at SIHP 19490, photograph from Robins et al. (2006:139).

### 3.2.1.4 Trails

Several Traditional Hawaiian trail segments are situated within the project area and other major trails have been identified within the larger PTA boundaries. These isolated trail segments often consist of worn lava paths, sometimes with associated linear curbstone constructions, and alignments of cairns or ahu. SIHP 5009, the Pu‘u Kapele trail, is located within TA 17, and a 100-meter-long trail segment is mapped at SIHP 23457 within TA 7. Trail segments leading to habitation features have also been documented at SIHP 19490 within TA 5 (Figure 20).

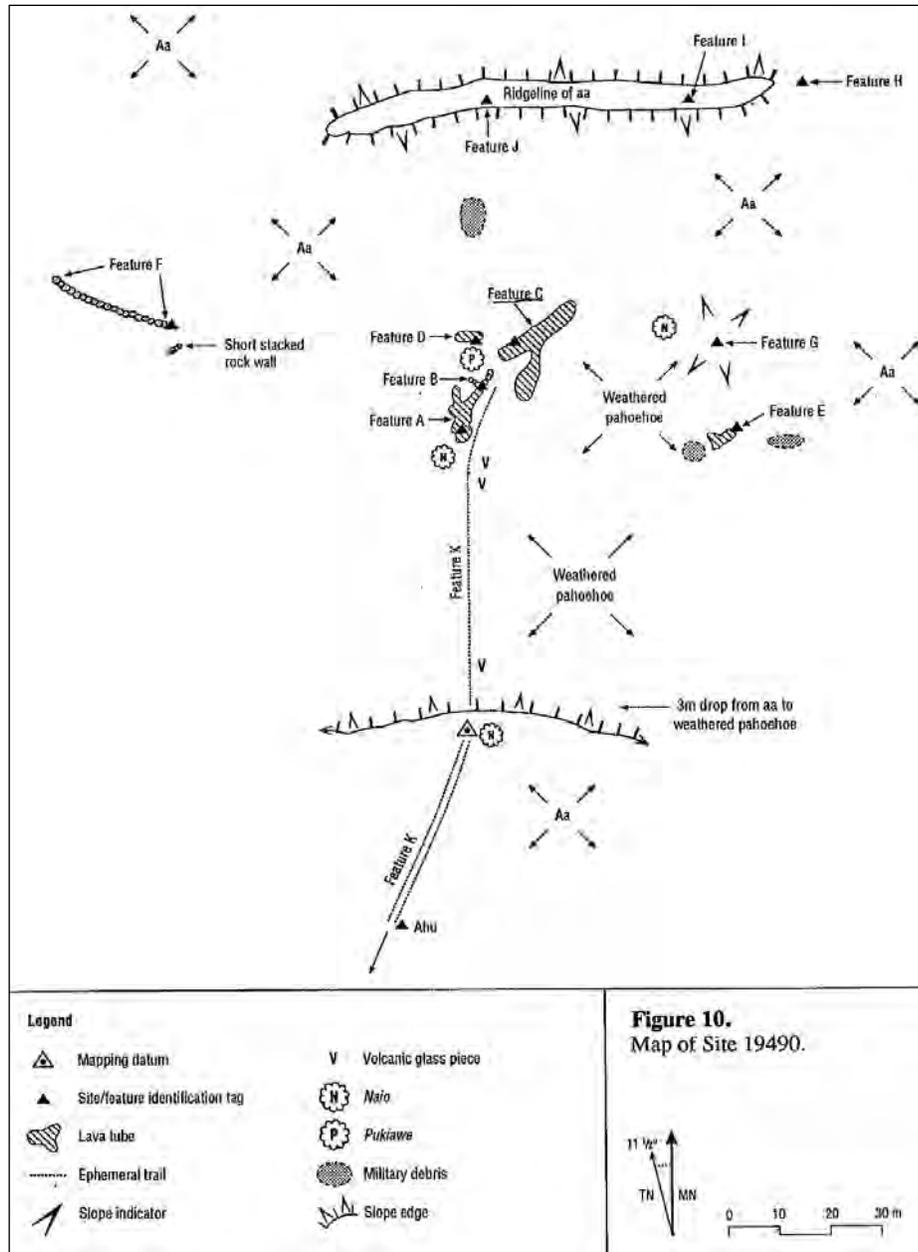


Figure 20. Plan view showing trail segments (Features F and K) mapped at SIHP 19490, from Shapiro et al. (1998:45).

### **3.2.2 Historic Period Sites**

Historic Period archaeological sites located within the project area include late-nineteenth to early-twentieth century ranching infrastructure remnants (walls, mounds, animal enclosures, fence lines) and features associated with land surveying activities (survey benchmark, boundary monuments). Several additional sites of unknown origin (mounds, modified outcrops, C-shaped structures, habitation lava tubes) may be affiliated with the early Post-Contact to Historic periods, but no determination on the origin of these sites has been made by PTA CRM staff.

#### ***3.2.2.1 Ranching Sites***

Ranching sites include rock walls, fence lines, and animal enclosures. Some of these are associated with Parker Ranch and the Humu‘ula Sheep Station, located just east of the project area. SIHP 23452, a fence line incorporating a rock wall base constructed around 1895, extends across a roughly 10-mile-long alignment within the project area, situated to the south of Saddle Road. Other Historic Period ranching features are in the eastern portion of the project area, including SIHPs 23846 (animal enclosure), 23847 (alignment), and 23850 (corral).

#### ***3.2.2.2 Trails, Transportation, and Land Survey Associated Sites***

While the age of the trail segments located within the project area (SIHPs 5009 and 23457) are classified as Traditional Hawaiian in origin, they were also likely utilized during the Post-Contact and Historic periods. Their original construction and/or design may have been modified or expanded by foreigners traveling with horses and other pack animals.

Two historic features associated with government land surveying activities are situated within the project area, including a USGS survey marker (Site T-082217-08) at the southern boundary of the Ke‘āmuku parcel in TA 14 and a USGS elevation benchmark (Site T-040418-01) at the top of Pu‘u Omaokoili in TA 1.

### **3.2.3 Recent Military Features**

Following the attack at Pearl Harbor in 1941, over 50,000 acres of Parker Ranch were taken over by the U.S. military for war maneuvers (termed the Waikoloa Maneuver Area) and used as a live-fire training area. The town of Waimea was converted to an encampment named Camp Tarawa (Brennan 1974:164). The current Saddle Road was constructed in 1943 to allow movement into the interior in case of another foreign attack (Langlas et al. 1999:55). Military training maneuvers have expanded into the project area in the modern era, as indicated by the presence of hastily constructed rock training structures and associated debris. PTA CRM staff and cultural resource consultants have identified at least 435 military-associated features within the project area. Basic descriptive and locational data is maintained for these recent military features, which are avoided during current training activities.

## **4.0 HISTORIC ARCHITECTURAL RESOURCES**

Historic architectural resources represent the built human environment and are typically expressed as buildings and as structures, such as engineering works. The NHPA provides a definition for historic architectural properties as being typically 50 years of age or older and retaining historical significance and integrity per 36 CFR Part 800.4(c). To date, there are no historic architectural

resources known to be extant within State-owned land. Previous cultural resources studies have recorded and evaluated historic structures within PTA, including Quonset huts and other Cantonment facilities that date from the World War II to Cold War periods. These resources are located outside the region of influence in the nearby Cantonment and BAAF.

## **5.0 CONCLUSIONS**

Kleinfelder, Inc. conducted an archaeological literature review to support the preparation of an EIS that analyzes the environmental effects of a Proposed Action for the ATR at PTA project. The current document is meant to support the NEPA review process by compiling background information on existing conditions of tangible cultural resources (historic architectural resources and archaeological sites) known to exist within State-owned land at PTA. The results of this analysis help to generate a preliminary assessment of the project's potential impacts on tangible cultural resources as well as recommendations for managing the impacts of the Proposed Action. This document will be appended to the EIS as a contributing technical study.

The majority of the project area is located within Ka'ohē Mauka Ahupua'a, Hāmākua District, with a small portion extending east into Humu'ula Ahupua'a, Hilo District, on the island of Hawai'i. The State-owned land forming the project area consists of approximately 23,000 acres encompassing five TMK parcels: (3) 3-8-001:013 and :022, (3) 4-4-015:008, (3) 4-4-016:005, and (3) 7-1-004:007. The eastern two-thirds of the project area consist of a roughly two-mile-wide corridor extending northwest-southeast through PTA along the Saddle Road (State Route 200) corridor between Gilbert Kahele Recreation Park to the east and the Saddle Road-Daniel K. Inouye Highway junction to the west. The western third of the project area comprises a roughly 8,000-acre area which extends towards the western PTA boundary and southwest of the Ke'amuku parcel.

One hundred-five (105) archaeological sites are recorded within the project area. Recorded sites within the project area include a range of Traditional Hawaiian and Historic Period archaeological sites; no historic structures or buildings are present within the project area. Approximately 50 percent of the project area has been subjected to archeological inventory survey, comprising 31 separate investigations. Although other archaeological projects have been conducted within State-owned land, these 31 studies meet USAG-HI's standards for archaeological investigation and so are counted as surveyed and inventoried land. Approximately 50 percent of State-owned land has either remained unsurveyed or was subjected to older studies that do not meet the USAG-HI's current standards.

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# **Biological Species Descriptions**



## Appendix K

# BIOLOGICAL SPECIES DESCRIPTIONS

Throughout this appendix, the first introduction of a plant or wildlife species includes the scientific name, followed by the common and local names. Subsequent references to wildlife species use the common name; however, because most plant species do not have a common name, subsequent references use the shortened scientific name.

### K.1 Protected Plant Species

***Exocarpos menziesii* (Menzie’s ballart, heau):** This long-lived perennial shrub is a member of the *Santalaceae* (sandalwood) family. It grows up to 6.6 feet tall with densely branched stems with maroon-tinged ends, scale-like leaves that are elliptic to oblanceolate, and red flowers. It prefers *Metrosideros* shrublands, dry forest areas, and sparsely vegetated lava flows between 4,600 and 6,900 feet in elevation (USAG-PTA, 2022a). The pre-Leilani fire Pōhakuloa Training Area (PTA) population estimate for *E. menziesii* was 5,550 individuals with two individuals documented on State-owned land at PTA (USAG-PTA, 2024a). Post-Leilani fire surveys documented one *E. menziesii* individual on State-owned land at PTA (USAG-PTA, 2024b), representing a 50 percent loss of *E. menziesii* individuals on State-owned land at PTA.

Over the 2022-2023 reporting period, 16 *E. menziesii* seeds were collected for the seed lab propagation (USAG-PTA, 2024a).

***Festuca hawaiiensis* (Hawaiian fescue):** This perennial grass is a member of the *Poaceae* (grass) family. It grows annually in clumps 1.6 to 5 feet tall with flat, smooth blades. It prefers dry montane ecosystem forest at 6,000 feet in elevation in the *Dodonaea viscosa* Shrubland Alliance, *Metrosideros polymorpha* Woodland Alliance, *Myoporum sandwicense* – *Sophora chrysophylla* Shrubland Alliance, and *Myoporum sandwicense* – *Sophora chrysophylla* Woodland Alliance vegetation types (USAG-PTA, 2022a). The pre-Leilani fire PTA population estimate was 11,669 individuals with a minimum count of 181 individuals documented on State-owned land at PTA (USAG-PTA, 2024a). Since the Leilani fire, the PTA Natural Resources Program (NRP) staff have surveyed 38 percent (14 of 37 survey plots) of the known *F. hawaiiensis* population and documented 52 individuals on State-owned land at PTA (USAG-PTA, 2024d). This number represents a subset of the *F. hawaiiensis* population and does not represent the full population for this species on the State-owned land at PTA. PTA NRP staff continue to work to understand the Leilani fire impacts to this species.

***Haplostachys haplostachya* (Hawaiian mint, honohono):** This perennial, short-lived, woody herb is a member of the *Lamiaceae* (mint) family. It has square, wooly stems that grow 1 to 2 feet tall with leaves that are simple and have a narrow heart shape. It prefers dry exposed areas on stony, shallow soils, lava outcrops, and ash-veneered lava (USAG-PTA, 2022a). The pre-Leilani fire PTA population estimate was 17,215 individuals (USFWS, 2020a) with a minimum count of 11,242 individuals documented on State-owned land (USAG-PTA, 2024a). Since the Leilani fire, the PTA NRP staff have surveyed 33 percent (18 of

54 survey plots) of the known *H. haplostachya* population and documented 5,004 individuals on State-owned land at PTA; 3,241 of which were seedlings (USAG-PTA, 2024d). This number represents a subset of the *H. haplostachya* population and does not represent the full population for this species on the State-owned land at PTA. PTA NRP staff continue to work to understand the Leilani fire impacts to this species.

***Kadua coriacea* (leather-leaf sweet ear, kio'ele):** This short-lived small, many branched shrub is a member of the *Rubiaceae* (coffee) family. It has leathery oblong leaves 1 to 3 inches long and 0.6 to 1 inch wide with clusters flowers at the branch ends. It is found in pāhoehoe lava flows in the *Metrosideros polymorpha* Woodland Alliance vegetation type at elevations between 4,500 and 5,000 feet (USAG-PTA, 2022a). In 2020, there were 150 individuals across 128 locations installation-wide (USAG-PTA, 2022a). There was a single *K. coriacea* individual documented on State-owned land at PTA before the Leilani fire, that individual was documented during post-Leilani fire surveys (USAG-PTA, 2024b).

***Portulaca sclerocarpa* (hard fruit purslane, po'e):** This short-lived perennial herb is a member of the *Portulacaceae* (purslane) family. It has a woody, tuberous taproot with 8-inch stems and succulent green to grayish leaves. At PTA, it is found on barren lava and in the *Metrosideros polymorpha* Woodland Alliance and *Myoporum sandwicense* - *Sophora chrysophylla* Shrubland Alliance vegetation types between 3,000 and 5,000 feet in elevation (USAG-PTA, 2022a). There were 5 individuals documented on State-owned land at PTA before the Leilani fire (USAG-PTA, 2023). Three *P. sclerocarpa* were documented on State-owned land during post-Leilani fire surveys (USAG-PTA, 2024b), representing a 40 percent loss of *P. sclerocarpa* individuals on State-owned land at PTA.

Over the 2022-2023 reporting period, 296 *P. sclerocarpa* seeds were collected for long-term storage at PTA (USAG-PTA, 2024a).

***Silene hawaiiensis* (Hawaiian catchfly):** This sprawling, short-lived perennial shrub is a member of the *Caryophyllaceae* (pink) family. It has an enlarged root with 6- to 16-inch climbing stems with short, sticky hairs and slender leaves. At PTA, it is found on barren lava, on disturbed sites, and in the *Metrosideros polymorpha* Woodland Alliance, *Chenopodium oahuense* Shrubland Alliance, *Dodonaea viscosa* Shrubland Alliance, *Myoporum sandwicense* - *Sophora chrysophylla* Shrubland Alliance, and *Eragrostis atropioides* Herbaceous Alliance vegetation types (USAG-PTA, 2022a). The pre-Leilani fire PTA population estimate was 7,479 individuals with a minimum count of 1,991 individuals documented on State-owned land at PTA (USAG-PTA, 2024a). Since the Leilani fire, the PTA NRP staff have surveyed 22 percent (5 of 23 survey plots) of the known *S. hawaiiensis* population and documented 32 individuals on State-owned land at PTA; 3 of which were seedlings (USAG-PTA, 2024d). This number represents a subset of the *S. hawaiiensis* population and does not represent the full population for this species on the State-owned land at PTA. PTA NRP staff continue to work to understand the Leilani fire impacts to this species.

***Silene lanceolata* (lance-leaf catchfly):** This upright perennial shrub is a member of the *Caryophyllaceae* (pink) family. It has an enlarged root with a 6- to 20-inch single stem from a woody base with multiple branches above and narrow smooth leaves with open clustered flowers. At PTA, it is found in the *Metrosideros polymorpha* Woodland Alliance, *Myoporum sandwicense* – *Sophora chrysophylla* Woodland Alliance, *Myoporum sandwicense* – *Sophora chrysophylla* Shrubland Alliance, and *Dodonaea viscosa* Shrubland Alliance vegetation types (USAG-PTA, 2022a). The pre-Leilani fire PTA estimate was 10,326 individuals (USFWS, 2021a), with a minimum count of 646 individuals documented on State-owned land at PTA (USAG-PTA, 2024a). Since the Leilani fire, the PTA NRP staff have surveyed 32 percent (10 of 31 survey plots) of the known *S. lanceolata* population and documented 712 individuals on State-owned land

at PTA; 114 of which were seedlings (USAG-PTA, 2024d). This number represents a subset of the *S. lanceolata* population and does not represent the full population for this species on the State-owned land at PTA. PTA NRP staff continue to work to understand the Leilani fire impacts to this species.

***Solanum incompletum* (Hawaiian prickly leaf, pōpolo kū mai):** This short-lived woody perennial shrub is a member of the *Solanaceae* (nightshade) family that grows up to 9 feet. Stems and lower leaves have reddish prickles and oval leaves that are 4 to 6 inches long and 3 inches wide with loose flower clusters and round berry fruit that is black to orange/yellow in color. At PTA, it is found on lava flows of various ages in the *Metrosideros polymorpha* Woodland Alliance, *Myoporum sandwicense* – *Sophora chrysophylla* Shrubland Alliance, and *Dodonaea viscosa* Shrubland Alliance vegetation types (USAG-PTA, 2022a). The U.S. Fish and Wildlife Service (USFWS) statewide population estimate is approximately 73 to 113 individuals across 3 locations; this species benefits especially from ungulate and rodent control (USFWS, 2020b). The pre-Leilani fire PTA State-owned land population was 11 individuals (USAG-PTA, 2023). Post-Leilani fire surveys documented five *S. incompletum* on State-owned land at PTA (USAG-PTA, 2024b), representing a 55 percent loss of *S. incompletum* individuals on State-owned land at PTA.

Over the 2022-2023 reporting period, eight *S. incompletum* seeds were collected for long-term storage at PTA (USAG-PTA, 2024a).

***Stenogyne angustifolia* var. *angustifolia* (creeping mint):** This short-lived perennial vine is a member of the *Lamiaceae* (mint) family with slender stems and opposite branching that are smooth and four-sided with a leathery leaf that is between 1 and 3 inches long and 3 to 4 inches wide with tubular flowers. It is found to grow on relatively flat, ash-veneered lava and shallow soils in semi-arid shrublands and woodlands (USAG-PTA, 2022a). The pre-Leilani fire PTA population estimate was 12,038 individuals with a minimum count of 4,640 individuals documented on State-owned land at PTA (USAG-PTA, 2024a). Since the Leilani fire, the PTA NRP staff have surveyed 36 percent (70 of 194 survey plots) of the known *S. angustifolia* var. *angustifolia* population and documented 501 individuals on State-owned land at PTA; 86 of which were seedlings (USAG-PTA, 2024d). This number represents a subset of the *S. angustifolia* var. *angustifolia* population and does not represent the full population for this species on the State-owned land at PTA. PTA NRP staff continue to work to understand the Leilani fire impacts to this species.

Over the 2022-2023 reporting period, six *S. angustifolia* var. *angustifolia* cuttings were collected for propagation at PTA (USAG-PTA, 2024a).

***Tetramolopium arenarium* (Mauna Kea pāmakani):** This short-lived perennial, erect tufted shrub is a member of the *Asteraceae* (sunflower) family that is 2.5 to 4 feet tall with alternate toothless (or shallow toothed) lance-shaped leaves with flower clusters at the end of the stems. At PTA, this species is found in the *Dodonaea viscosa* Shrubland Alliance vegetation type at elevations between 4,000 and 7,000 feet (USAG-PTA, 2022a). The pre-Leilani fire PTA population estimate was 420 individuals in a single population (USFWS, 2020c) with 94 individuals documented on State-owned land at PTA (USAG-PTA, 2023). Post Leilani fire surveys documented 40 *T. arenarium* on State-owned land at PTA (USAG-PTA, 2024b), representing a 57 percent loss of *T. arenarium* individuals on State-owned land at PTA.

***Zanthoxylum hawaiiense* (Hawaiian yellow wood, a'e):** This small deciduous tree is a member of the *Rutaceae* (rue) family that is 9 to 24 feet tall with alternate lance-shaped, toothed, lemon-scented leaves comprised of three leaflets. At PTA, this species is found in *Metrosideros*-dominated lowland dry or mesic forests, in montane dry forests, and on lava from 1,800 to 5,700 feet in elevation (USAG-PTA, 2022a). The

pre-Leilani fire USFWS statewide population estimate was one population of 660 mature plants and seedlings (USFWS, 2021b). with 47 individuals documented on State-owned land at PTA (USAG-PTA, 2023). Post-Leilani fire surveys documented 46 *Z. hawaiiense* individuals on State-owned land at PTA (USAG-PTA, 2024b), representing a 2 percent loss of *Z. hawaiiense* individuals on State-owned land at PTA.

Over the 2022-2023 reporting period, 24 *Z. hawaiiense* seeds were collected for long-term storage at PTA (USAG-PTA, 2024a).

## K.2 Protected Invertebrate Species

***Hylaeus anthracinus* (anthracinan yellow-faced bee):** The anthracinan yellow-faced bee is a solitary small to medium-sized bee that resembles a small wasp with black legs and clear to smokey wings. They occupy all native habitat types up to 9,000 feet in elevation and are generally associated with native plants. In 2004, a single, yellow-faced bee specimen was collected at PTA, but the exact location is unknown (USAG-PTA, 2020c). According to USFWS, this species occurs in five coastal and possibly one montane dry forest population on the island of Hawai'i, five coastal locations on the island of O'ahu, one coastal and one dry forest location on the island of Maui, three coastal locations on the island of Moloka'i, and one coastal location on the island of Kaho'olawe (USFWS, 2021c).

This bee species, typically found along coasts, was found in a *K. coriacea* fruit capsule in an unknown location at PTA and was suspected to have been accidentally transported to the installation. *K. coriacea* typically occurs in open *Metrosideros* treeland and is generally considered a poor habitat for this bee species; therefore, it is questionable whether a breeding population exists at the installation. A 2018 *Hylaeus* species survey did not record any anthracinan yellow-faced bees at PTA. There were no individuals documented over the 2022-2023 reporting period (USAG-PTA, 2024a).

***Manduca blackburni* (Blackburn's sphinx moth):** The Blackburn's sphinx moth has a 5-inch wingspan and is considered Hawai'i's largest native moth, with long narrow forewings and a spindly shaped body that is grayish brown with black bands and five orange spots along both sides of the abdomen. It is found in coastal mesic and dry forests between sea level up to 5,000 feet in elevation in areas receiving less than 50 inches of rain annually (DLNR, 2015b). The moth was discovered at PTA in July 2019, and there have been three documented occurrences to date. None of the moth observations have been on State-owned land, which is mostly above the moth's 5,000-foot elevation preference. This species appears to be closely tied with *Nicotiana glauca* (*tree tobacco*) plants, although caterpillars were documented on *S. incompletum* in November 2019. USFWS is working with the Department of Land and Natural Resources, Division of Forestry and Wildlife to obtain species abundance. A 2014 Hawai'i Department of Transportation survey of approximately 50 acres along Saddle Road estimated a moth density of approximately 0.54 moths per acre (USFWS, 2019).

*N. glauca* clearing is essential to provide fuel breaks for fire suppression; however, this plant is also a food source and non-native host plant for larvae of the Blackburn's sphinx moth. For this reason, *N. glauca* is only controlled when found above the upper elevation limit of the known moth range (5,000 feet) or when young plants less than 3 feet in height are found on fuel breaks at any elevation. PTA NRP staff adhere to USFWS guidance when controlling *N. glauca* to minimize potential effects to this species. No Blackburn's sphinx moth individuals were documented over the 2022-2023 reporting period (USAG-PTA, 2024a).

### K.3 Protected Bird Species

***Asio flammeus sandwichensis* (Hawaiian short-eared owl, pueo):** Over the 2022-2023 reporting period, PTA NRP staff documented four Hawaiian short-eared owls during avian species counts on U.S. Government-owned land on PTA; however, this species has historically been incidentally observed on State-owned land. NRP staff provide comments and guidance to maintenance activities (e.g., roadside mowing to reduce wildland fire risks) to minimize impacts to the Hawaiian short-eared owl and consider impacts of natural resources projects (e.g., whether the owl may be attracted to A24 traps) prior to implementation (USAG-PTA, 2024a).

***Branta sandvicensis* (Hawaiian goose, nēnē):** The translocation of 595 Hawaiian geese from Kauaʻi to the island of Hawaiʻi between 2011 and 2016 created new visitation patterns and breeding behaviors for the species on the island. Many of the translocated geese were released at Puʻu Oʻo in the Hilo Forest Reserve, 11 miles east of PTA. Hawaiian geese have been observed at PTA, including on State-owned land in Training Areas (TAs) 1, 3, 4, 6, and 7. The most frequent observations occur at Bradshaw Army Airfield (BAAF) and on TAs 1, 3, and 4 (USAG-PTA, 2014a). Of the geese that could be identified by leg bands, it is estimated approximately 48 percent of the sightings (12 geese) were from the translocated population. Hawaiian goose breeding activity has been exceedingly rare at PTA, with three documented nesting events since 2014. In 2014, two successful nesting events occurred; defined as “hatched goslings,” one nest was at BAAF and a second at Forward Operating Base Warrior (a collective reference to TAs 1, 3, and 4) on State-owned land (USAG-PTA, 2014a; USAG-PTA, 2014b). There were no known nesting attempts between 2019 and 2021. PTA NRP staff conducted 191 surveys in 2021; four Hawaiian geese were observed during monitoring events, with two of these sightings occurring at TA 3 on State-owned land. There have been an additional four geese reported, not on State-owned land, from incidental sightings not associated with monitoring events (USAG-PTA, 2022a). Over the 2022-2023 reporting period, there were 193 surveys conducted at PTA, and 15 Hawaiian geese were detected during those surveys. Additionally, there were 25 Hawaiian goose detections from incidental sightings. A total of 13 of the Hawaiian goose detections were on State-owned land at PTA. There was no Hawaiian goose nesting observed over the reporting period (USAG-PTA, 2024a).

Hawaiian goose management at PTA includes:

- Monitoring for goose presence and behavior
- Implementing actions to reduce goose and military training conflicts
- Monitoring incidental take of Hawaiian geese
- Briefing PTA personnel

Hawaiian geese are systematically monitored to assist NRP staff to understand habitat use and visitation patterns, provide information on breeding, nesting, molting, and potential incidental take that could occur at PTA, and inform direct management strategies. Core monitoring areas include the Range 1 Complex; the Forward Operating Base Warrior Search Area in TAs 1, 3, and 4; TAs 6 and 7; and BAAF. Hawaiian goose monitoring protocols include traversing the area by foot or by driving accessible roads and searching for Hawaiian geese with binoculars on a weekly basis. If a Hawaiian goose is observed in flight or on the ground, the date, time, location, observer information, number of individuals, band identification, and behavior are recorded (USAG-PTA, 2024a). In addition to the systematic monitoring that PTA NRP staff conduct, the installation also enforces Hawaiian goose restrictions, which include:

- Conducting range sweeps for Hawaiian geese prior to use.
- Reporting Hawaiian geese present on live-fire ranges or in vehicle maneuver areas.
- Immediately reporting any harmed, harassed, injured, or dead geese.
- Immediately reporting if geese are preventing training or harm to a goose is unavoidable.
- Not harming, harassing, injuring, or killing Hawaiian geese.
- Reporting Hawaiian geese if they are present when units are ready to be placed in a “Hot” status.
- Maintaining the safety of geese on live-fire ranges and vehicle maneuver areas.
- Policing the area for trash and food debris.
- Reporting all bird strikes (including aerial strikes) and preserving remains, when possible.
- Obeying 15 miles per hour speed limit, unless a waiver is granted (USAG-PTA, 2020c).

***Buteo solitarius* (Hawaiian hawk, ‘io):** The Hawaiian hawk has been documented within native and non-native Hawai‘i Island forests but it has not been a common visitor to PTA and documented observations are considered transient. While the 2013 Biological Opinion concluded a “no effect” to this species for all military training activities at PTA and the USFWS delisted this species in 2020, the Hawaiian hawk is still considered endangered by the State. Installation staff implement management for the Hawaiian hawk under the Integrated Natural Resources Management Plan and in accordance with the Migratory Bird Treaty Act (USAG-PTA, 2020c; USAG-PTA, 2024a).

***Hydrobates castro* (band-rumped storm petrel, ‘akē‘akē):** The band-rumped storm petrel has been detected at PTA since 2008; however, this species has not been detected on State-owned land at PTA. Acoustical activity suggests the species may be present seasonally; however, it is unknown how this species may use habitats in PTA. The band-rumped storm petrel is known to use the Saddle Region as a flyway to nesting habitat, typically located on the steep slopes of the northeast rift zone of Mauna Loa within Hawai‘i Volcanoes National Park (USMC, 2013). Between September 2022 and September 2023, PTA NRP staff used specially trained detector dogs to conduct 10 burrow surveys covering over 23 miles; no band-rumped storm petrel burrows were documented on State-owned land at PTA. Additionally, NRP staff assisted Hawai‘i Department of Land and Natural Resources-Division of Forestry and Wildlife staff to survey for band-rumped storm petrels at Mauna Loa using the detector dogs, placing cameras on potential burrows and provided guidance on camera settings (USAG-PTA, 2024a).

Since May 2020, the Army has been working informally with USFWS on predator control during breeding season at the band-rumped storm petrel colony in the southeastern portion of PTA on U.S. Government-owned land. USFWS concurred that these actions, which include burrow surveys with a detector dog and predator management, may affect, but are not likely to adversely affect, the colonies. Over approximately 30 days between August and September 2021, a trained search dog covered approximately 14 miles of area. The search dog showed interest in two established burrows with cameras and a new burrow that had a monitoring camera added. Monitoring cameras are positioned 6 feet away facing the burrow; a total of six burrows were monitored between May and September 2021. Two of the burrows were determined to be active (USAG-PTA, 2022a). Because there is not much known about the Hawai‘i Distinct Population Segment of the band-rumped storm petrel, surveys and monitoring add much needed life-cycle information for this species.

NRP staff maintain a State *Protected Wildlife Permit - Scientific Collection (WL19-42 and WL21-15)* for the band-rumped storm petrel that authorizes the collection and possession of up to 25 band-rumped storm petrel carcasses per year for the purpose of understanding predation level at PTA. Additionally, NRP staff maintain a *USFWS Scientific Collection Permit (MB95880B)* and a *USFWS Recovery Permit (TE40123A-3)* (USAG-PTA, 2024a).

***Pterodroma sandwichensis* (Hawaiian petrel, 'ua'u):** Hawaiian petrel colonies are generally found at high elevation, xeric habitats or dense and wet forests. This species uses crevices, cracks, burrows, or lava tubes for nesting. Historical breeding colonies have been documented at Mauna Loa and possibly Mauna Kea. Archaeological evidence suggests that the Hawaiian petrel was once common in the Saddle Region of Hawaii Island. The Hawaiian petrel has been detected on U.S. Government-owned land since 1995 (USAG-PTA, 2020c). No active Hawaiian petrel nesting colonies have been documented on the installation. In 2016, PTA NRP staff determined that individuals transit the area and do not use habitat at PTA; however, PTA staff continue to record individual detections (USAG-PTA, 2024a).

PTA NRP staff actively monitor for Hawaiian petrels on PTA. Between September 2022 and September 2023, PTA NRP staff used specially trained detector dogs to conduct 10 burrow surveys covering over 23 miles; no Hawaiian petrel burrows were documented at PTA. Additionally, NRP staff assisted Hawai'i Department of Land and Natural Resources-Division of Forestry and Wildlife staff to survey for Hawaiian petrels at Mauna Loa by using the detector dogs, placing cameras on potential burrows and providing guidance on camera settings (USAG-PTA, 2024a).

It is not known for certain why the Hawaiian petrel no longer use PTA habitat. Generally, this species prefers to nest above 8,200 feet, which is higher than PTA. Additionally, it is suspected individuals may have ceased using PTA habitat because of introduced predators (e.g., mongoose, cats, dogs) and habitat degradation (Hu et. al, 2001; Duffy & Capece, 2014).

## K.4 Protected Mammal Species

In Hawai'i, observations of the Hawaiian hoary bat have occurred in native, non-native, developed, and agricultural areas between sea level and 7,500 feet in elevation. No Hawaiian hoary bat roosts have been observed or detected at PTA, but passive acoustic detection of the bat has occurred at monitoring locations on State-owned land. Current acoustic monitoring (2014 to present) uses 45 periodic monitoring stations, 18 of which are on State-owned land, and 5 year-round monitoring stations, 3 of which are on State-owned land at PTA (USAG-PTA, 2024a). Per the 2003 Biological Opinion Incidental Take Statement, incidental take for the Hawaiian hoary bat is indirectly measured by degradation or destruction of potential available treeland roosting habitat; there are no statewide estimates available for the Hawaiian hoary bat. PTA acoustic activity analyses and occupancy modeling show that Hawaiian hoary bats are present across the installation throughout the year and that activity peaks during the autumn months (USAG-PTA, 2024a).

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# State and County Plans and Policies



## Appendix L

# STATE AND COUNTY PLANS AND POLICIES

## L.1 Hawai'i State Plan, Hawai'i Revised Statutes, Chapter 226

**Table L-1** details which goals from HRS Chapter 226, the *Hawai'i State Plan*, are supported by, or not applicable to, the Proposed Action. For those goals that are supported by the Proposed Action, a discussion and consistency review are provided in **Table 5-2, Section 5.3.2**.

<b>Table L-1: Hawai'i State Plan, Hawai'i Revised Statutes, Chapter 226</b>			
<b>S = Supportive, N/S = Not Supportive, N/A = Not Applicable</b>			
	<b>S</b>	<b>N/S</b>	<b>N/A</b>
<b>Section 226-4: State Goals.</b>			
In order to guarantee, for the present and future generations, those elements of choice and mobility that ensure that individuals and groups may approach their desired levels of self-reliance and self-determination, it shall be the goal of the State to achieve:			
(1) A strong, viable economy, characterized by stability, diversity, and growth, that enables the fulfillment of the needs and expectations of Hawai'i's present and future generations.	X		
(2) A desired physical environment, characterized by beauty, cleanliness, quiet, stable natural systems, and uniqueness, that enhances the mental and physical well-being of the people.	X		
(3) Physical, social and economic well-being, for individuals and families in Hawai'i, that nourishes a sense of community responsibility, of caring, and of participation in community life.	X		
<b>Section 226-5: Objective and Policies for Population.</b>			
(A) It shall be the objective in planning for the State's population to guide population growth to be consistent with the achievement of physical, economic, and social objectives contained in this chapter;			
(B) To achieve the population objective, it shall be the policy of this State to:			
(1) Manage population growth statewide in a manner that provides increased opportunities for Hawai'i's people to pursue their physical, social and economic aspirations while recognizing the unique needs of each county.			X
(2) Encourage an increase in economic activities and employment opportunities on the neighbor islands consistent with community needs-and desires.			X
(3) Promote increased opportunities for Hawai'i's people to pursue their socioeconomic aspirations throughout the islands.			X
(4) Encourage research activities and public awareness programs to foster an understanding of Hawai'i's limited capacity to accommodate population needs and to address concerns resulting from an increase in Hawai'i's population.			X
(5) Encourage federal actions and coordination among major governmental agencies to promote a more balanced distribution of immigrants among states, provided that such actions do not prevent the reunion of immediate family members.			X
(6) Pursue an increase in federal assistance for states with a greater proportion of foreign immigrants relative to their state's population.			X
(7) Plan the development and availability of land and water resources in a coordinated manner so as to provide for the desired levels of growth in each geographic area.			X
<b>Section 226-6: Objectives and Policies for the Economy in General.</b>			
(A) Planning for the State's economy in general shall be directed toward achievement of the following objectives:			
(1) Increased and diversified employment opportunities to achieve full employment, increased income and job choice, and improved living standards for Hawai'i's people, while at the same time stimulating	X		

<b>Table L-1: Hawai'i State Plan, Hawai'i Revised Statutes, Chapter 226</b>	<b>S</b>	<b>N/S</b>	<b>N/A</b>
<b>S = Supportive, N/S = Not Supportive, N/A = Not Applicable</b>			
the development and expansion of economic activities capitalizing on defense, dual-use, and science and technology assets, particularly on the neighbor islands where employment opportunities may be limited.			
(2) A steadily growing and diversified economic base that is not overly dependent on a few industries, and includes the development and expansion of industries on the neighbor islands.			X
<b>(B) To achieve the general economic objectives, it shall be the policy of this State to:</b>			
(1) Promote and encourage entrepreneurship within Hawai'i by residents and nonresidents of the State.			X
(2) Expand Hawai'i's national and international marketing, communication, and organizational ties, to increase the State's capacity to adjust to and capitalize upon economic changes and opportunities occurring outside the State.			X
(3) Promote Hawai'i as an attractive market for environmentally and socially sound investment activities that benefit Hawai'i's people.			X
(4) Transform and maintain Hawai'i as a place that welcomes and facilitates innovative activity that may lead to commercial opportunities.			X
(5) Promote innovative activity that may pose initial risks, but ultimately contribute to the economy of Hawai'i.			X
(6) Seek broader outlets for new or expanded Hawai'i business investments.			X
(7) Expand existing markets and penetrate new markets for Hawai'i's products and services.			X
(8) Assure that the basic economic needs of Hawai'i's people are maintained in the event of disruptions in overseas transportation.			X
(9) Strive to achieve a level of construction activity responsive to, and consistent with, State growth objectives.			X
(10) Encourage the formation of cooperatives and other favorable marketing arrangements at the local or regional level to assist Hawai'i's small-scale producers, manufacturers, and distributors.			X
(11) Encourage labor-intensive activities that are economically satisfying and which offer opportunities for upward mobility.			X
(12) Encourage innovative activities that may not be labor-intensive, but may otherwise contribute to the economy of Hawai'i.			X
(13) Foster greater cooperation and coordination between the government and private sectors in developing Hawai'i's employment and economic growth opportunities.			X
(14) Stimulate the development and expansion of economic activities which will benefit areas with substantial or expected employment problems.			X
(15) Maintain acceptable working conditions and standards for Hawai'i's workers.			X
(16) Provide equal employment opportunities for all segments of Hawai'i's population through affirmative action and nondiscrimination measures.			X
(17) Stimulate the development and expansion of economic activities capitalizing on defense, dual-use, and science and technology assets, particularly on the neighbor islands where employment opportunities may be limited.			X
(18) Encourage businesses that have favorable financial multiplier effects within Hawai'i's economy, particularly with respect to emerging industries in science and technology.			X
(19) Promote and protect intangible resources in Hawai'i, such as scenic beauty and the aloha spirit, which are vital to a healthy economy.			X
(20) Increase effective communication between the educational community and the private sector to develop relevant curricula and training programs to meet future employment needs in general, and requirements of new or innovative potential growth industries in particular.			X
(21) Foster a business climate in Hawai'i--including attitudes, tax and regulatory policies, and financial and technical assistance programs--that is conducive to the expansion of existing enterprises and the creation and attraction of new business and industry.			X
<b>Section 226-7 Objectives and Policies for the Economy – Agriculture.</b>			
<b>(A) Planning for the State's economy with regard to agriculture shall be directed towards achievement of the following objectives:</b>			
(1) Viability of Hawai'i's sugar and pineapple industries.			X
(2) Growth and development of diversified agriculture throughout the State.			X

<b>Table L-1: Hawai'i State Plan, Hawai'i Revised Statutes, Chapter 226</b>	<b>S</b>	<b>N/S</b>	<b>N/A</b>
<b>S = Supportive, N/S = Not Supportive, N/A = Not Applicable</b>			
(3) An agriculture industry that continues to constitute a dynamic and essential component of Hawai'i's strategic, economic, and social well-being.			X
<b>(B) To achieve the agriculture objectives, it shall be the policy of this State to:</b>			
(1) Establish a clear direction for Hawai'i's agriculture through stakeholder commitment and advocacy.			X
(2) Encourage agriculture by making best use of natural resources.			X
(3) Provide the governor and the legislature with information and options needed for prudent decision making for the development of agriculture.			X
(4) Establish strong relationships between the agricultural and visitor industries for mutual marketing benefits.			X
(5) Foster increased public awareness and understanding of the contributions and benefits of agriculture as a major sector of Hawai'i's economy.			X
(6) Seek the enactment and retention of federal and State legislation that benefits Hawai'i's agricultural industries.			X
(7) Strengthen diversified agriculture by developing an effective promotion, marketing, and distribution system between Hawai'i's food producers and consumers in the State, nation, and world.			X
(8) Support research and development activities that strengthen economic productivity in agriculture, stimulate greater efficiency, and enhance the development of new products and agricultural by-products.			X
(9) Enhance agricultural growth by providing public incentives and encouraging private initiatives.			X
(10) Assure the availability of agriculturally suitable lands with adequate water to accommodate present and future needs.			X
(11) Increase the attractiveness and opportunities for an agricultural education and livelihood.			X
(12) In addition to the State's priority on food, expand Hawai'i's agricultural base by promoting growth and development of flowers, tropical fruits and plants, livestock, feed grains, forestry, food crops, aquaculture, and other potential enterprises.			X
(13) Promote economically competitive activities that increase Hawai'i's agricultural self-sufficiency, including the increased purchase and use of Hawai'i-grown food and food products by residents, businesses, and governmental bodies as defined under section 103D-104.			X
(14) Promote and assist in the establishment of sound financial programs for diversified agriculture.			X
(15) Institute and support programs and activities to assist the entry of displaced agricultural workers into alternative agricultural or other employment.			X
(16) Facilitate the transition of agricultural lands in economically non-feasible agricultural production to economically viable agricultural uses.			X
(17) Perpetuate, promote, and increase use of traditional Hawaiian farming systems, such as the use of loko i'a, māla, and irrigated lo'i, and growth of traditional Hawaiian crops, such as kalo, 'uala, and 'ulu.			X
(18) Increase and develop small-scale farms.			X
<b>Section 226-8 Objective and Policies for the Economy - Visitor Industry.</b>			
(A) Planning for the State's economy with regard to the visitor industry shall be directed towards the achievement of the objective of a visitor industry that constitutes a major component of steady growth for Hawai'i's economy.			
<b>(B) To achieve the visitor industry objective, it shall be the policy of this State to:</b>			
(1) Support and assist in the promotion of Hawai'i's visitor attractions and facilities.			X
(2) Ensure that visitor industry activities are in keeping with the social, economic, and physical needs and aspirations of Hawai'i's people.			X
(3) Improve the quality of existing visitor destination areas by utilizing Hawai'i's strengths in science and technology.			X
(4) Encourage cooperation and coordination between the government and private sectors in developing and maintaining well-designed, adequately serviced visitor industry and related developments which are sensitive to neighboring communities and activities.			X
(5) Develop the industry in a manner that will continue to provide new job opportunities and steady employment for Hawai'i's people.			X
(6) Provide opportunities for Hawai'i's people to obtain job training and education that will allow for upward mobility within the visitor industry.			X

<b>Table L-1: Hawai'i State Plan, Hawai'i Revised Statutes, Chapter 226</b>		<b>S</b>	<b>N/S</b>	<b>N/A</b>
<b>S = Supportive, N/S = Not Supportive, N/A = Not Applicable</b>				
(7)	Foster a recognition of the contribution of the visitor industry to Hawai'i's economy and the need to perpetuate the aloha spirit.			X
(8)	Foster an understanding by visitors of the aloha spirit and of the unique and sensitive character of Hawai'i's cultures and values.			X
<b>Section 226-9 Objective and Policies for the Economy - Federal Expenditures.</b>				
(A) Planning for the State's economy with regard to federal expenditures shall be directed towards achievement of the objective of a stable federal investment base as an integral component of Hawai'i's economy.				
(B) To achieve the federal expenditures objective, it shall be the policy of this State to:				
(1)	Encourage the sustained flow of federal expenditures in Hawai'i that generates long-term government civilian employment;	X		
(2)	Promote Hawai'i's supportive role in national defense, in a manner consistent with Hawai'i's social, environmental, and cultural goals by building upon dual-use and defense applications to develop thriving ocean engineering, aerospace research and development, and related dual-use technology sectors in Hawai'i's economy;	X		
(3)	Promote the development of federally supported activities in Hawai'i that respect statewide economic concerns, are sensitive to community needs, and minimize adverse impacts on Hawai'i's environment;	X		
(4)	Increase opportunities for entry and advancement of Hawai'i's people into federal government service;	X		
(5)	Promote federal use of local commodities, services, and facilities available in Hawai'i;	X		
(6)	Strengthen federal-state-county communication and coordination in all federal activities that affect Hawai'i; and	X		
(7)	Pursue the return of federally controlled lands in Hawai'i that are not required for either the defense of the nation or for other purposes of national importance, and promote the mutually beneficial exchanges of land between federal agencies, the State, and the counties.	X		
<b>Section 226-10 Objective and Policies for the Economy - Potential Growth Activities.</b>				
(A) Planning for the State's economy with regard to potential growth activities shall be directed towards achievement of the objective of development and expansion of potential growth activities that serve to increase and diversify Hawai'i's economic base.				
(B) To achieve the potential growth activity objective, it shall be the policy of this State to:				
(1)	Facilitate investment and employment growth in economic activities that have the potential to expand and diversify Hawai'i's economy, including but not limited to diversified agriculture, aquaculture, renewable energy development, creative media, health care, and science and technology-based sectors;			X
(2)	Facilitate investment in innovative activity that may pose risks or be less labor-intensive than other traditional business activity, but if successful, will generate revenue in Hawai'i through the export of services or products or substitution of imported services or products;			X
(3)	Encourage entrepreneurship in innovative activity by academic researchers and instructors who may not have the background, skill, or initial inclination to commercially exploit their discoveries or achievements;			X
(4)	Recognize that innovative activity is not exclusively dependent upon individuals with advanced formal education, but that many self-taught, motivated individuals are able, willing, sufficiently knowledgeable, and equipped with the attitude necessary to undertake innovative activity;			X
(5)	Increase the opportunities for investors in innovative activity and talent engaged in innovative activity to personally meet and interact at cultural, art, entertainment, culinary, athletic, or visitor-oriented events without a business focus;			X
(6)	Expand Hawai'i's capacity to attract and service international programs and activities that generate employment for Hawai'i's people;			X
(7)	Enhance and promote Hawai'i's role as a center for international relations, trade, finance, services, technology, education, culture, and the arts;			X
(8)	Accelerate research and development of new energy-related industries based on wind, solar, ocean, underground resources, and solid waste;			X
(9)	Promote Hawai'i's geographic, environmental, social, and technological advantages to attract new or innovative economic activities into the State;			X

<b>Table L-1: Hawai'i State Plan, Hawai'i Revised Statutes, Chapter 226</b>	<b>S</b>	<b>N/S</b>	<b>N/A</b>
<b>S = Supportive, N/S = Not Supportive, N/A = Not Applicable</b>			
(10) Provide public incentives and encourage private initiative to attract new or innovative industries that best support Hawai'i's social, economic, physical, and environmental objectives;			X
(11) Increase research and the development of ocean-related economic activities such as mining, food production, and scientific research;			X
(12) Develop, promote, and support research and educational and training programs that will enhance Hawai'i's ability to attract and develop economic activities of benefit to Hawai'i;			X
(13) Foster a broader public recognition and understanding of the potential benefits of new or innovative growth-oriented industry in Hawai'i;			X
(14) Encourage the development and implementation of joint federal and State initiatives to attract federal programs and projects that will support Hawai'i's social, economic, physical, and environmental objectives;			X
(15) Increase research and development of businesses and services in the telecommunications and information industries;			X
(16) Foster the research and development of non-fossil fuel and energy efficient modes of transportation; and			X
(17) Recognize and promote health care and health care information technology as growth industries.			X
<b>Section 226-10.5 Objectives and Policies for the Economy - Information Industry.</b>			
(A) Planning for the State's economy with regard to telecommunications and information technology shall be directed toward recognizing that broadband and wireless communication capability and infrastructure are foundations for an innovative economy and positioning Hawai'i as a leader in broadband and wireless communications and applications in the Pacific Region.			
(B) To achieve the information industry objective, it shall be the policy of this State to:			
(1) Promote efforts to attain the highest speeds of electronic and wireless communication within Hawai'i and between Hawai'i and the world, and make high speed communication available to all residents and businesses in Hawai'i;			X
(2) Encourage the continued development and expansion of the telecommunications infrastructure serving Hawai'i to accommodate future growth and innovation in Hawai'i's economy;			X
(3) Facilitate the development of new or innovative business and service ventures in the information industry which will provide employment opportunities for the people of Hawai'i;			X
(4) Encourage mainland- and foreign-based companies of all sizes, whether information technology-focused or not, to allow their principals, employees, or contractors to live in and work from Hawai'i, using technology to communicate with their headquarters, offices, or customers located out-of-State;			X
(5) Encourage greater cooperation between the public and private sectors in developing and maintaining a well-designed information industry;			X
(6) Ensure that the development of new businesses and services in the industry are in keeping with the social, economic, and physical needs and aspirations of Hawai'i's people;			X
(7) Provide opportunities for Hawai'i's people to obtain job training and education that will allow for upward mobility within the information industry;			X
(8) Foster a recognition of the contribution of the information industry to Hawai'i's economy; and			X
(9) Assist in the promotion of Hawai'i as a broker, creator, and processor of information in the Pacific.			X
<b>Section 226-11 Objectives and Policies for the Physical Environment - Land-based, Shoreline, and Marine Resources.</b>			
(A) Planning for the State's physical environment with regard to land-based, shoreline and marine resources shall be directed towards achievement of the following objectives:			
(1) Prudent use of Hawai'i's land-based, shoreline, and marine resources.	X		
(2) Effective protection of Hawai'i's unique and fragile environmental resources.	X		
(B) To achieve the land-based, shoreline, and marine resources objectives, it shall be the policy of this State to:			
(1) Exercise an overall conservation ethic in the use of Hawai'i's natural resources.	X		
(2) Ensure compatibility between land-based and water-based activities and natural resources and ecological systems.	X		
(3) Take into account the physical attributes of areas when planning and designing activities and facilities.			X
(4) Manage natural resources and environs to encourage their beneficial and multiple uses without generating costly or irreparable environmental damage.	X		

<b>Table L-1: Hawai'i State Plan, Hawai'i Revised Statutes, Chapter 226</b>		<b>S</b>	<b>N/S</b>	<b>N/A</b>
<b>S = Supportive, N/S = Not Supportive, N/A = Not Applicable</b>				
(5)	Consider multiple uses in watershed areas, provided such uses do not detrimentally affect water quality and recharge functions.	X		
(6)	Encourage the protection of rare or endangered plant and animal species and habitats native to Hawai'i.	X		
(7)	Provide public incentives that encourage private actions to protect significant natural resources from degradation or unnecessary depletion.			X
(8)	Pursue compatible relationships among activities, facilities, and natural resources.	X		
(9)	Promote increased accessibility and prudent use of inland and shoreline areas for public recreational, educational, and scientific purposes.	X		
<b>Section 226-12 Objective and Policies for the Physical Environment - Scenic, Natural Beauty, and Historic Resources.</b>				
(A) Planning for the State's physical environment shall be directed towards achievement of the objective of enhancement of Hawai'i's scenic assets, natural beauty, and multi-cultural/historical resources.				
(B) To achieve the scenic, natural beauty, and historic resources objective, it shall be the policy of this State to:				
(1)	Promote the preservation and restoration of significant natural and historic resources.	X		
(2)	Provide incentives to maintain and enhance historic, cultural, and scenic amenities.			X
(3)	Promote the preservation of views and vistas to enhance the visual and aesthetic enjoyment of mountains, ocean, scenic landscapes, and other natural features.	X		
(4)	Protect those special areas, structures, and elements that are an integral and functional part of Hawai'i's ethnic and cultural heritage.	X		
(5)	Encourage the design of developments and activities that complement the natural beauty of the islands.			X
<b>Section 226-13 Objectives and Policies for the Physical Environment - Land, Air, and Water Quality.</b>				
(A) Planning for the State's physical environment with regard to land, air, and water quality shall be directed towards achievement of the following objectives:				
(1)	Maintenance and pursuit of improved quality in Hawai'i's land, air, and water resources.	X		
(2)	Greater public awareness and appreciation of Hawai'i's environmental resources.			X
(B) To achieve the land, air, and water quality objectives, it shall be the policy of this State to:				
(1)	Foster educational activities that promote a better understanding of Hawai'i's limited environmental resources.			X
(2)	Promote the proper management of Hawai'i's land and water resources.	X		
(3)	Promote effective measures to achieve desired quality in Hawai'i's surface, ground, and coastal waters.	X		
(4)	Encourage actions to maintain or improve aural and air quality levels to enhance the health and well-being of Hawai'i's people.	X		
(5)	Reduce the threat to life and property from erosion, flooding, tsunamis, hurricanes, earthquakes, volcanic eruptions, and other natural or man-induced hazards and disasters.	X		
(6)	Encourage design and construction practices that enhance the physical qualities of Hawai'i's communities.			X
(7)	Encourage urban developments in close proximity to existing services and facilities.			X
(8)	Foster recognition of the importance and value of the land, air, and water resources to Hawai'i's people, their cultures and visitors.			X
<b>Section 226-14 Objective and Policies for Facility Systems - In General.</b>				
(A) Planning for the State's facility systems in general shall be directed towards achievement of the objective of water, transportation, waste disposal, and energy and telecommunication systems that support statewide social, economic, and physical objectives.				
(B) To achieve the general facility systems objective, it shall be the policy of this State to:				
(1)	Accommodate the needs of Hawai'i's people through coordination of facility systems and capital improvement priorities in consonance with State and county plans.			X
(2)	Encourage flexibility in the design and development of facility systems to promote prudent use of resources and accommodate changing public demands and priorities.			X
(3)	Ensure that required facility systems can be supported within resource capacities and at reasonable cost to the user.			X
(4)	Pursue alternative methods of financing programs and projects and cost-saving techniques in the planning, construction, and maintenance of facility systems.			X

<b>Table L-1: Hawai'i State Plan, Hawai'i Revised Statutes, Chapter 226</b>	<b>S</b>	<b>N/S</b>	<b>N/A</b>
<b>S = Supportive, N/S = Not Supportive, N/A = Not Applicable</b>			
<b>Section 226-15 Objectives and Policies for Facility Systems - Solid and Liquid Wastes.</b>			
(A) Planning for the State's facility systems with regard to solid and liquid wastes shall be directed towards the achievement of the following objectives:			
(1) Maintenance of basic public health and sanitation standards relating to treatment and disposal of solid and liquid wastes.			X
(2) Provision of adequate sewerage facilities for physical and economic activities that alleviate problems in housing, employment, mobility, and other areas.			X
(B) To achieve solid and liquid waste objectives, it shall be the policy of this State to:			
(1) Encourage the adequate development of sewerage facilities that complement planned growth.			X
(2) Promote re-use and recycling to reduce solid and liquid wastes and employ a conservation ethic.			X
(3) Promote research to develop more efficient and economical treatment and disposal of solid and liquid wastes.			X
<b>Section 226-16 Objective and Policies for Facility Systems - Water.</b>			
(A) Planning for the State's facility systems with regard to water shall be directed towards achievement of the objective of the provision of water to adequately accommodate domestic, agricultural, commercial, industrial, recreational, and other needs within resource capacities.			
(B) To achieve the facility systems water objective, it shall be the policy of this State to:			
(1) Coordinate development of land use activities with existing and potential water supply.			X
(2) Support research and development of alternative methods to meet future water requirements well in advance of anticipated needs.			X
(3) Reclaim and encourage the productive use of runoff water and wastewater discharges.			X
(4) Assist in improving the quality, efficiency, service, and storage capabilities of water systems for domestic and agricultural use.			X
(5) Support water supply services to areas experiencing critical water problems.			X
(6) Promote water conservation programs and practices in government, private industry, and the general public to help ensure adequate water to meet long-term needs.			X
<b>Section 226-17 Objectives and Policies for Facility Systems - Transportation.</b>			
(A) Planning for the State's facility systems with regard to transportation shall be directed towards the achievement of the following objectives:			
(1) An integrated multi-modal transportation system that services statewide needs and promotes the efficient, economical, safe, and convenient movement of people and goods.			X
(2) A statewide transportation system that is consistent with and will accommodate planned growth objectives throughout the State.			X
(B) To achieve the transportation objectives, it shall be the policy of this State to:			
(1) Design, program, and develop a multi-modal system in conformance with desired growth and physical development as stated in this chapter;			X
(2) Coordinate State, county, federal, and private transportation activities and programs toward the achievement of statewide objectives;			X
(3) Encourage a reasonable distribution of financial responsibilities for transportation among participating governmental and private parties;			X
(4) Provide for improved accessibility to shipping, docking, and storage facilities;			X
(5) Promote a reasonable level and variety of mass transportation services that adequately meet statewide and community needs;			X
(6) Encourage transportation systems that serve to accommodate present and future development needs of communities;			X
(7) Encourage a variety of carriers to offer increased opportunities and advantages to inter-island movement of people and goods;			X
(8) Increase the capacities of airport and harbor systems and support facilities to effectively accommodate transshipment and storage needs;			X
(9) Encourage the development of transportation systems and programs which would assist statewide economic growth and diversification;			X
(10) Encourage the design and development of transportation systems sensitive to the needs of affected communities and the quality of Hawai'i's natural environment;			X

<b>Table L-1: Hawai'i State Plan, Hawai'i Revised Statutes, Chapter 226</b>	<b>S</b>	<b>N/S</b>	<b>N/A</b>
<b>S = Supportive, N/S = Not Supportive, N/A = Not Applicable</b>			
(11) Encourage safe and convenient use of low-cost, energy-efficient, non-polluting means of transportation;			X
(12) Coordinate intergovernmental land use and transportation planning activities to ensure the timely delivery of supporting transportation infrastructure in order to accommodate planned growth objectives; and			X
(13) Encourage diversification of transportation modes and infrastructure to promote alternate fuels and energy efficiency.			X
<b>Section 226-18 Objectives and Policies for Facility Systems - Energy.</b>			
(A) Planning for the State's facility systems with regard to energy shall be directed toward the achievement of the following objectives, giving due consideration to all:			
(1) Dependable, efficient, and economical statewide energy systems capable of supporting the needs of the people;			X
(2) Increased energy security and self-sufficiency through the reduction and ultimate elimination of Hawai'i's dependence on imported fuels for electrical generation and ground transportation;			X
(3) Greater diversification of energy generation in the face of threats to Hawai'i's energy supplies and systems;			X
(4) Reduction, avoidance, or sequestration of greenhouse gas emissions from energy supply and use; and			X
(5) Utility models that make the social and financial interests of Hawai'i's utility customers a priority.			X
(B) To achieve the energy objectives, it shall be the policy of this State to ensure the provision of adequate, reasonably priced, and dependable energy services to accommodate demand.			
(C) To further achieve the energy objectives, it shall be the policy of this State to:			
(1) Support research and development as well as promote the use of renewable energy sources;			X
(2) Ensure that the combination of energy supplies and energy-saving systems is sufficient to support the demands of growth;			X
(3) Base decisions of least-cost supply-side and demand-side energy resource options on a comparison of their total costs and benefits when a least-cost is determined by a reasonably comprehensive, quantitative, and qualitative accounting of their long-term, direct and indirect economic, environmental, social, cultural, and public health costs and benefits;			X
(4) Promote all cost-effective conservation of power and fuel supplies through measures including: (A) Development of cost-effective demand-side management programs; (B) Education; (C) Adoption of energy-efficient practices and technologies; and (D) Increasing energy efficiency and decreasing energy use in public infrastructure;			X
(5) Ensure to the extent that new supply-side resources are needed, the development or expansion of energy systems utilizes the least-cost energy supply option and maximizes efficient technologies;			X
(6) Support research, development, and demonstration of energy efficiency, load management, and other demand-side management programs, practices, and technologies;			X
(7) Promote alternate fuels and energy efficiency by encouraging diversification of transportation modes and infrastructure;			X
(8) Support actions that reduce, avoid, or sequester greenhouse gases in utility, transportation, and industrial sector applications; and			X
(9) Support actions that reduce, avoid, or sequester Hawai'i's greenhouse gas emissions through agriculture and forestry initiatives.			X
(10) Provide priority handling and processing for all State and county permits required for renewable energy projects;			X
(11) Ensure that liquefied natural gas is used only as a cost-effective transitional, limited-term replacement of petroleum for electricity generation and does not impede the development and use of other cost-effective renewable energy sources; and			X
(12) Promote the development of indigenous geothermal energy resources that are located on public trust land as an affordable and reliable source of firm power for Hawai'i.			X
<b>Section 226-18.5 Objectives and Policies for Facility Systems - Telecommunications.</b>			
(A) Planning for the State's telecommunications facility systems shall be directed towards the achievement of dependable, efficient, and economical statewide telecommunications systems capable of supporting the needs of the people.			

<b>Table L-1: Hawai'i State Plan, Hawai'i Revised Statutes, Chapter 226</b>	<b>S</b>	<b>N/S</b>	<b>N/A</b>
<b>S = Supportive, N/S = Not Supportive, N/A = Not Applicable</b>			
(B) To achieve the telecommunications objective, it shall be the policy of this State to ensure the provision of adequate, reasonably priced, and dependable telecommunications services to accommodate demand.			
(C) To further achieve the telecommunications objective, it shall be the policy of this State to:			
(1) Facilitate research and development of telecommunications systems and resources;			X
(2) Encourage public and private sector efforts to develop means for adequate, ongoing telecommunications planning;			X
(3) Promote efficient management and use of existing telecommunications systems and services; and			X
(4) Facilitate the development of education and training of telecommunications personnel.			X
<b>Section 226-19 Objectives and Policies for Socio-Cultural Advancement - Housing.</b>			
(A) Planning for the State's socio-cultural advancement with regard to housing shall be directed toward the achievement of the following objectives:			
(1) Greater opportunities for Hawai'i's people to secure reasonably priced, safe, sanitary, and livable homes, located in suitable environments that satisfactorily accommodate the needs and desires of families and individuals, through collaboration and cooperation between government and nonprofit and for-profit developers to ensure that more affordable housing is made available to extremely low-, very low-, lower-, moderate-, and above moderate-income segments of Hawai'i's population.			X
(2) The orderly development of residential areas sensitive to community needs and other land uses.			X
(3) The development and provision of affordable rental housing by the State to meet the housing needs of Hawai'i's people.			X
(B) To achieve the housing objectives, it shall be the policy of this State to			
(1) Effectively accommodate the housing needs of Hawai'i's people.			X
(2) Stimulate and promote feasible approaches that increase housing choices for low-income, moderate-income, and gap-group households.			X
(3) Increase homeownership and rental opportunities and choices in terms of quality, location, cost, densities, style, and size of housing.			X
(4) Promote appropriate improvement, rehabilitation, and maintenance of existing housing units and residential areas.			X
(5) Promote design and location of housing developments taking into account the physical setting, accessibility to public facilities and services, and other concerns of existing communities and surrounding areas.			X
(6) Facilitate the use of available vacant, developable, and underutilized urban lands for housing.			X
(7) Foster a variety of lifestyles traditional to Hawai'i through the design and maintenance of neighborhoods that reflect the culture and values of the community.			X
(8) Promote research and development of methods to reduce the cost of housing construction in Hawai'i.			X
<b>Section 226-20 Objectives and Policies for Socio-Cultural Advancement - Health.</b>			
(A) Planning for the State's socio-cultural advancement with regard to health shall be directed towards achievement of the following objectives:			
(1) Fulfillment of basic individual health needs of the general public.			X
(2) Maintenance of sanitary and environmentally healthful conditions in Hawai'i's communities.			X
(B) To achieve the health objectives, it shall be the policy of this State to:			
(1) Provide adequate and accessible services and facilities for prevention and treatment of physical and mental health problems, including substance abuse.			X
(2) Encourage improved cooperation among public and private sectors in the provision of health care to accommodate the total health needs of individuals throughout the State.			X
(3) Encourage public and private efforts to develop and promote statewide and local strategies to reduce health care and related insurance costs.			X
(4) Foster an awareness of the need for personal health maintenance and preventive health care through education and other measures.			X
(5) Provide programs, services, and activities that ensure environmentally healthful and sanitary conditions.			X
(6) Improve the State's capabilities in preventing contamination by pesticides and other potentially hazardous substances through increased coordination, education, monitoring, and enforcement.			X

<b>Table L-1: Hawai'i State Plan, Hawai'i Revised Statutes, Chapter 226</b>	<b>S</b>	<b>N/S</b>	<b>N/A</b>
<b>S = Supportive, N/S = Not Supportive, N/A = Not Applicable</b>			
(7) Prioritize programs, services, interventions, and activities that address identified social determinants of health to improve native Hawaiian health and well-being consistent with the United States Congress' declaration of policy as codified in title 42 United States Code section 11702, and to reduce health disparities of disproportionately affected demographics, including native Hawaiians, other Pacific Islanders, and Filipinos. The prioritization of affected demographic groups other than native Hawaiians may be reviewed every ten years and revised based on the best available epidemiological and public health data.			X
<b>Section 226-21 Objective and Policies for Socio-Cultural Advancement - Education.</b>			
(A) Planning for the State's socio-cultural advancement with regard to education shall be directed towards achievement of the objective of the provision of a variety of educational opportunities to enable individuals to fulfill their needs, responsibilities, and aspirations.			
(B) To achieve the education objective, it shall be the policy of this State to:			
(1) Support educational programs and activities that enhance personal development, physical fitness, recreation, and cultural pursuits of all groups.			X
(2) Ensure the provision of adequate and accessible educational services and facilities that are designed to meet individual and community needs.			X
(3) Provide appropriate educational opportunities for groups with special needs.			X
(4) Promote educational programs which enhance understanding of Hawai'i's cultural heritage.			X
(5) Provide higher educational opportunities that enable Hawai'i's people to adapt to changing employment demands.			X
(6) Assist individuals, especially those experiencing critical employment problems or barriers, or undergoing employment transitions, by providing appropriate employment training programs and other related educational opportunities.			X
(7) Promote programs and activities that facilitate the acquisition of basic skills, such as reading, writing, computing, listening, speaking, and reasoning.			X
(8) Emphasize quality educational programs in Hawai'i's institutions to promote academic excellence.			X
(9) Support research programs and activities that enhance the education programs of the State.			X
<b>Section 226-22 Objective and Policies for Socio-Cultural Advancement - Social Services.</b>			
(A) Planning for the State's socio-cultural advancement with regard to social services shall be directed towards the achievement of the objective of improved public and private social services and activities that enable individuals, families, and groups to become more self-reliant and confident to improve their well-being.			
(B) To achieve the social service objective, it shall be the policy of the State to:			
(1) Assist individuals, especially those in need of attaining a minimally adequate standard of living and those confronted by social and economic hardship conditions, through social services and activities within the State's fiscal capacities.			X
(2) Promote coordination and integrative approaches among public and private agencies and programs to jointly address social problems that will enable individuals, families, and groups to deal effectively with social problems and to enhance their participation in society.			X
(3) Facilitate the adjustment of new residents, especially recently arrived immigrants, into Hawai'i's communities.			X
(4) Promote alternatives to institutional care in the provision of long-term care for elder and disabled populations.			X
(5) Support public and private efforts to prevent domestic abuse and child molestation, and assist victims of abuse and neglect.			X
(6) Promote programs which assist people in need of family planning services to enable them to meet their needs.			X
<b>Section 226-23 Objective and Policies for Socio-Cultural Advancement - Leisure.</b>			
(A) Planning for the State's socio-cultural advancement with regard to leisure shall be directed towards the achievement of the objective of the adequate provision of resources to accommodate diverse cultural, artistic, and recreational needs for present and future generations.			
(B) To achieve the leisure objective, it shall be the policy of this State to:			
(1) Foster and preserve Hawai'i's multi-cultural heritage through supportive cultural, artistic, recreational, and humanities-oriented programs and activities.			X

<b>Table L-1: Hawai'i State Plan, Hawai'i Revised Statutes, Chapter 226</b>	<b>S</b>	<b>N/S</b>	<b>N/A</b>
<b>S = Supportive, N/S = Not Supportive, N/A = Not Applicable</b>			
(2) Provide a wide range of activities and facilities to fulfill the cultural, artistic, and recreational needs of all diverse and special groups effectively and efficiently.			X
(3) Enhance the enjoyment of recreational experiences through safety and security measures, educational opportunities, and improved facility design and maintenance.			X
(4) Promote the recreational and educational potential of natural resources having scenic, open space, cultural, historical, geological, or biological values while ensuring that their inherent values are preserved.			X
(5) Ensure opportunities for everyone to use and enjoy Hawai'i's recreational resources.			X
(6) Assure the availability of sufficient resources to provide for future cultural, artistic, and recreational needs.			X
(7) Provide adequate and accessible physical fitness programs to promote the physical and mental well-being of Hawai'i's people.			X
(8) Increase opportunities for appreciation and participation in the creative arts, including the literary, theatrical, visual, musical, folk, and traditional art forms.			X
(9) Encourage the development of creative expression in the artistic disciplines to enable all segments of Hawai'i's population to participate in the creative arts.			X
(10) Assure adequate access to significant natural and cultural resources in public ownership.			X
<b>Section 226-24 Objective and Policies for Socio-Cultural Advancement - Individual Rights and Personal Well-Being.</b>			
(A) Planning for the State's socio-cultural advancement with regard to individual rights and personal well-being shall be directed towards achievement of the objective of increased opportunities and protection of individual rights to enable individuals to fulfill their socio-economic needs and aspirations.			
(B) To achieve the individual rights and personal well-being objective, it shall be the policy of this State to:			
(1) Provide effective services and activities that protect individuals from criminal acts and unfair practices and that alleviate the consequences of criminal acts in order to foster a safe and secure environment.			X
(2) Uphold and protect the national and state constitutional rights of every individual.			X
(3) Assure access to, and availability of, legal assistance, consumer protection, and other public services which strive to attain social justice.			X
(4) Ensure equal opportunities for individual participation in society.			X
<b>Section 226-25 Objective and Policies for Socio-Cultural Advancement - Culture.</b>			
(A) Planning for the State's socio-cultural advancement with regard to culture shall be directed toward the achievement of the objective of enhancement of cultural identities, traditions, values, customs, and arts of Hawai'i's people.			
(B) To achieve the culture objective, it shall be the policy of this State to:			
(1) Foster increased knowledge and understanding of Hawai'i's ethnic and cultural heritages and the history of Hawai'i.	X		
(2) Support activities and conditions that promote cultural values, customs, and arts that enrich the lifestyles of Hawai'i's people and which are sensitive and responsive to family and community needs.	X		
(3) Encourage increased awareness of the effects of proposed public and private actions on the integrity and quality of cultural and community lifestyles in Hawai'i.	X		
(4) Encourage the essence of the aloha spirit in people's daily activities to promote harmonious relationships among Hawai'i's people and visitors.	X		
<b>Section 226-26 Objectives and Policies for Socio-Cultural Advancement - Public Safety.</b>			
(A) Planning for the State's socio-cultural advancement with regard to public safety shall be directed towards the achievement of the following objectives:			
(1) Assurance of public safety and adequate protection of life and property for all people.	X		
(2) Optimum organizational readiness and capability in all phases of emergency management to maintain the strength, resources, and social and economic well-being of the community in the event of civil disruptions, wars, natural disasters, and other major disturbances.	X		
(3) Promotion of a sense of community responsibility for the welfare and safety of Hawai'i's people.			X
(B) To achieve the public safety objectives, it shall be the policy of this State to:			
(1) Ensure that public safety programs are effective and responsive to community needs.			X
(2) Encourage increased community awareness and participation in public safety programs.			X
(C) To further achieve public safety objectives related to criminal justice, it shall be the policy of this State to:			
(1) Support criminal justice programs aimed at preventing and curtailing criminal activities.			X

<b>Table L-1: Hawai'i State Plan, Hawai'i Revised Statutes, Chapter 226</b>		<b>S</b>	<b>N/S</b>	<b>N/A</b>
<b>S = Supportive, N/S = Not Supportive, N/A = Not Applicable</b>				
(2)	Develop a coordinated, systematic approach to criminal justice administration among all criminal justice agencies.			X
(3)	Provide a range of correctional resources which may include facilities and alternatives to traditional incarceration in order to address the varied security needs of the community and successfully reintegrate offenders into the community.			X
<b>(D) To further achieve public safety objectives related to emergency management, it shall be the policy of this State to:</b>				
(1)	Ensure that responsible organizations are in a proper state of readiness to respond to major war-related, natural, or technological disasters and civil disturbances at all times.	X		
(2)	Enhance the coordination between emergency management programs throughout the State.	X		
<b>Section 226-27 Objectives and Policies for Socio-Cultural Advancement - Government.</b>				
<b>(A) Planning the State's socio-cultural advancement with regard to government shall be directed towards the achievement of the following objectives:</b>				
(1)	Efficient, effective, and responsive government services at all levels in the State.			X
(2)	Fiscal integrity, responsibility, and efficiency in the State government and county governments.			X
<b>(B) To achieve the government objectives, it shall be the policy of this State to:</b>				
(1)	Provide for necessary public goods and services not assumed by the private sector.			X
(2)	Pursue an openness and responsiveness in government that permits the flow of public information, interaction, and response.			X
(3)	Minimize the size of government to that necessary to be effective.			X
(4)	Stimulate the responsibility in citizens to productively participate in government for a better Hawai'i.			X
(5)	Assure that government attitudes, actions, and services are sensitive to community needs and concerns.			X
(6)	Provide for a balanced fiscal budget.			X
(7)	Improve the fiscal budgeting and management system of the State.			X
(8)	Promote the consolidation of State and county governmental functions to increase the effective and efficient delivery of government programs and services and to eliminate duplicative services wherever feasible.			X

## L.2 Hawai'i State Environmental Policy

**Table L-2** details which policy guidelines from HRS Section 344-4, the *State Environmental Policy*, are supported by, or not applicable to, the Proposed Action. For those policies that are supported by the Proposed Action, a discussion and consistency review are provided in **Table 5-4, Section 5.3.2**.

<b>Table L-2: Hawai'i State Environmental Policy, Hawai'i Revised Statutes, Section 344-4</b>		<b>S</b>	<b>N/S</b>	<b>N/A</b>
<b>S = Supportive, N/S = Not Supportive, N/A = Not Applicable</b>				
<b>(1) Population.</b>				
(A)	Recognize population impact as a major factor in environmental degradation and adopt guidelines to alleviate this impact and minimize future degradation;			X
(B)	Recognize optimum population levels for counties and districts within the State, keeping in mind that these will change with technology and circumstance, and adopt guidelines to limit population to the levels determined.			X
<b>(2) Land, water, mineral, visual, air, and other natural resources.</b>				
(A)	Encourage management practices which conserve and fully utilize all natural resources;	X		
(B)	Promote irrigation and waste water management practices which conserve and fully utilize vital water resources;			X
(C)	Promote the recycling of waste water;			X
(D)	Encourage management practices which conserve and protect watersheds and water sources, forest, and open space areas;	X		
(E)	Establish and maintain natural area preserves, wildlife preserves, forest reserves, marine preserves, and unique ecological preserves;			X
(F)	Maintain an integrated system of state land use planning which coordinates the state and county general plans;			X
(G)	Promote the optimal use of solid wastes through programs of waste prevention, energy resource recovery, and recycling so that all our wastes become utilized.			X
<b>(3) Flora and fauna.</b>				
(A)	Protect endangered species of indigenous plants and animals and introduce new plants or animals only upon assurance of negligible ecological hazard;	X		
(B)	Foster the planting of native as well as other trees, shrubs, and flowering plants compatible to the enhancement of our environment.			X
<b>(4) Parks, recreation, and open space.</b>				
(A)	Establish, preserve and maintain scenic, historic, cultural, park and recreation areas, including the shorelines, for public recreational, educational, and scientific uses;	X		
(B)	Protect the shorelines of the State from encroachment of artificial improvements, structures, and activities;			X
(C)	Promote open space in view of its natural beauty not only as a natural resource but as an ennobling, living environment for its people.	X		
<b>(5) Economic development.</b>				
(A)	Encourage industries in Hawai'i which would be in harmony with our environment;			X
(B)	Promote and foster the agricultural industry of the State; and preserve and conserve productive agricultural lands;			X
(C)	Encourage federal activities in Hawai'i to protect the environment;	X		
(D)	Encourage all industries including the fishing, aquaculture, oceanography, recreation, and forest products industries to protect the environment;			X
(E)	Establish visitor destination areas with planning controls which shall include but not be limited to the number of rooms;			X
(F)	Promote and foster the aquaculture industry of the State; and preserve and conserve productive aquacultural lands.			X
<b>(6) Transportation.</b>				
(A)	Encourage transportation systems in harmony with the lifestyle of the people and environment of the State;			X

<b>Table L-2: Hawai'i State Environmental Policy, Hawai'i Revised Statutes, Section 344-4</b>		<b>S</b>	<b>N/S</b>	<b>N/A</b>
<b>S = Supportive, N/S = Not Supportive, N/A = Not Applicable</b>				
(B)	Adopt guidelines to alleviate environmental degradation caused by motor vehicles;			X
(C)	Encourage public and private vehicles and transportation systems to conserve energy, reduce pollution emission, including noise, and provide safe and convenient accommodations for their users.			X
<b>(7) Energy.</b>				
(A)	Encourage the efficient use of energy resources.			X
<b>(8) Community life and housing.</b>				
(A)	Foster lifestyles compatible with the environment; preserve the variety of lifestyles traditional to Hawai'i through the design and maintenance of neighborhoods which reflect the culture and mores of the community;			X
(B)	Develop communities which provide a sense of identity and social satisfaction in harmony with the environment and provide internal opportunities for shopping, employment, education, and recreation;			X
(C)	Encourage the reduction of environmental pollution which may degrade a community;			X
(D)	Foster safe, sanitary, and decent homes;			X
(E)	Recognize community appearances as major economic and aesthetic assets of the counties and the State; encourage green belts, plantings, and landscape plans and designs in urban areas; and preserve and promote mountain-to-ocean vistas.			X
<b>(9) Education and culture.</b>				
(A)	Foster culture and the arts and promote their linkage to the enhancement of the environment;			X
(B)	Encourage both formal and informal environmental education to all age groups.			X
<b>(10) Citizen participation.</b>				
(A)	Encourage all individuals in the State to adopt a moral ethic to respect the natural environment; to reduce waste and excessive consumption; and to fulfill the responsibility as trustees of the environment for the present and succeeding generations; and			X
(B)	Provide for expanding citizen participation in the decision making process so it continually embraces more citizens and more issues.			X

## L.3 County of Hawai‘i General Plan

**Table L-3** details which goals from the 2005 County of Hawai‘i General Plan are supported by, or not applicable to, the Proposed Action. For those policies that are supported by the Proposed Action, a discussion and consistency review are provided in **Table 5-5, Section 5.3.3**.

<b>Table L-3: County of Hawai‘i General Plan</b> S = Supportive, N/S = Not Supportive, N/A = Not Applicable		S	N/S	N/A
<b>Economic</b>				
A.	Provide residents with opportunities to improve their quality of life through economic development that enhances the County’s natural and social environments.	X		
B.	Economic development and improvement shall be in balance with the physical, social, and cultural environments of the island of Hawai‘i.	X		
C.	Strive for diversity and stability in the economic system.	X		
D.	Provide an economic environment that allows new, expanded, or improved economic opportunities that are compatible with the County’s cultural, natural and social environment.	X		
E.	Strive for an economic climate that provides its residents an opportunity for choice of occupation.	X		
F.	Strive for diversification of the economy by strengthening existing industries and attracting new endeavors.	X		
G.	Strive for full employment.	X		
H.	Promote and develop the island of Hawai‘i into a unique scientific and cultural model, where economic gains are in balance with social and physical amenities. Development should be reviewed on the basis of total impact on the residents of the County, not only in terms of immediate short run economic benefits.	X		
<b>Energy</b>				
A.	Strive towards energy self-sufficiency.			X
B.	Establish the Big Island as a demonstration community for the development and use of natural energy sources.			X
<b>Environmental Quality</b>				
A.	Define the most desirable use of land within the County that achieves an ecological balance providing residents and visitors the quality of life and an environment in which the natural resources of the island are viable and sustainable.	X		
B.	Maintain and, if feasible, improve the existing environmental quality of the island.	X		
C.	Control pollution.	X		
<b>Flooding and Other Natural Hazards</b>				
A.	Protect human life.	X		
B.	Prevent damage to man-made improvements.	X		
C.	Control pollution.	X		
D.	Prevent damage from inundation.	X		
E.	Reduce surface water and sediment runoff.	X		
F.	Maximize soil and water conservation.	X		
<b>Historic Sites</b>				
A.	Protect, restore, and enhance the sites, buildings, and objects of significant historical and cultural importance to Hawai‘i.	X		
B.	Appropriate access to significant historic sites, buildings, and objects of public interest should be made available.	X		
C.	Enhance the understanding of man’s place on the landscape by understanding the system of ahupua’a.	X		
<b>Natural Beauty</b>				
A.	Protect, preserve and enhance the quality of areas endowed with natural beauty, including the quality of coastal scenic resources.	X		

<b>Table L-3: County of Hawai'i General Plan</b>		<b>S</b>	<b>N/S</b>	<b>N/A</b>
<b>S = Supportive, N/S = Not Supportive, N/A = Not Applicable</b>				
B.	Protect scenic vistas and view planes from becoming obstructed.	X		
C.	Maximize opportunities for present and future generations to appreciate and enjoy natural and scenic beauty.	X		
<b>Natural Resources and Shoreline</b>				
A.	Protect and conserve the natural resources from undue exploitation, encroachment and damage.	X		
B.	Provide opportunities for recreational, economic, and educational needs without despoiling or endangering natural resources.	X		
C.	Protect and promote the prudent use of Hawai'i's unique, fragile, and significant environmental and natural resources.	X		
D.	Protect rare or endangered species and habitats native to Hawai'i.	X		
E.	Protect and effectively manage Hawai'i's open space, watersheds, shoreline, and natural areas.	X		
F.	Ensure that alterations to existing land forms, vegetation, and construction of structures cause minimum adverse effect to water resources, and scenic and recreational amenities and minimum danger of floods, landslides, erosion, siltation, or failure in the event of an earthquake.	X		
<b>Housing</b>				
A.	Attain safe, sanitary, and livable housing for the residents of the County of Hawai'i.			X
B.	Attain a diversity of socio-economic housing mix throughout the different parts of the County.			X
C.	Maintain a housing supply that allows a variety of choices.			X
D.	Create viable communities with affordable housing and suitable living environments.			X
E.	Improve and maintain the quality and affordability of the existing housing inventory.			X
F.	Seek sufficient production of new affordable rental and fee-simple housing in the County in a variety of sizes to satisfactorily accommodate the needs and desires of families and individuals.			X
G.	Ensure that housing is available to all persons regardless of age, sex, marital status, ethnic background, and income.			X
H.	Make affordable housing available in reasonable proximity to employment centers.			X
I.	Encourage and expand home ownership opportunities for residents.			X
<b>Public Facilities</b>				
A.	Encourage the provision of public facilities that effectively service community and visitor needs and seek ways of improving public service through better and more functional facilities in keeping with the environmental and aesthetic concerns of the community.			X
<b>Public Utilities</b>				
A.	Ensure that properly regulated, adequate, efficient, and dependable public and private utility services are available to users.			X
B.	Maximize efficiency and economy in the provision of public utility services.			X
C.	Design public utility facilities to fit into their surroundings or concealed from public view.			X
<b>Recreation</b>				
A.	Provide a wide variety of recreational opportunities for the residents and visitors of the County.	X		
B.	Maintain the natural beauty of recreation areas.	X		
C.	Provide a diversity of environments for active and passive pursuits.	X		
<b>Transportation</b>				
A.	Provide a transportation system whereby people and goods can move efficiently, safely, comfortably and economically.			X
B.	Make available a variety of modes of transportation that best meets the needs of the County.			X
<b>Land Use</b>				
A.	Designate and allocate land uses in appropriate proportions and mix and in keeping with the social, cultural, and physical environments of the County.	X		
B.	Protect and encourage the intensive and extensive utilization of the County's important agricultural lands.	X		
C.	Protect and preserve forest, water, natural and scientific reserves and open areas.	X		

Appendix M

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# **Army Land Retention Community Engagement 2024**





## **2024 Army Community Engagements Related to Land Retention**

<b>January</b>		
<b>Date</b>	<b>Command/Unit</b>	<b>Engagement</b>
<b>1/3/2024</b>	USARPAC, USAG-HI PTA	PTA Site Visit, Chair Dawn Chang, AG and DLNR Staff
<b>1/4/2024 – 1/5/2024</b>	USAG-HI PTA	Live Fire Firefighter Training with Hawai'i County Fire Department
<b>1/6/2024</b>	USAG-HI	Mālama Mākua Cultural Access
<b>1/8/2024</b>	USINDOPACOM, USARPAC, USAG-HI	Briefing to State Legislature
<b>1/9/2024</b>	USAG-HI PTA	Attendance at the Hawai'i Island Chamber of Commerce Meeting
<b>1/10/2024</b>	USAG-HI	Native Hawaiian Advisory Council Meeting
<b>1/13/2024</b>	USAG-HI	Mākaha Service Project
<b>1/16/2024</b>	USINDOPACOM, USARPAC, USAG-HI/PTA	Bi-Annual Military Affairs Council State of Indo-Pacific Event
<b>1/16/2024</b>	USAG-HI PTA	Mauna Kea Soil and Water Conversation District Long Range Plan for Natural Resources Conservation Service (Waimea)
<b>1/18/2024</b>	USARPAC	Native Hawaiian Leaders Working Group Meeting
<b>1/18/2024</b>	USAG-HI	Outreach and consultation with Koa Mana/Glen Kila
<b>1/25/2024</b>	USAG-HI PTA	Waikōloa Firewise Community Meeting
<b>1/26/2024</b>	USINDOPACOM, USARPAC, USAG-HI	Wai'anae Moku Kūpuna Council Joint (Army/Navy) Engagement Event: Community meeting in Wai'anae attended by REP Tokuda and other elected officials.
<b>1/26/2024</b>	USAG-HI PTA	Hawai'i Leeward Planning Conference
<b>1/27/2024</b>	USAG-HI	Mālama Mākua Cultural Access
<b>1/27/2024</b>	USAG-HI PTA	Participated in the Wall that Heals Ceremony (Hilo)
<b>1/30/2024</b>	USAG-HI PTA	International Invasive Species and Climate Change Conference
<b>1/31/2024</b>		

<b>February</b>		
<b>Date</b>	<b>Command/Unit</b>	<b>Engagement</b>
2/1/2024	USAG-HI	Mālama Mākua Cultural Access
2/1/2024	USAG-HI PTA	Waimea Community Association Speaking Event
2/4/2024	USAG-HI	NAGPRA meeting with Flores-Case Ohana
2/4/2024	USAG-HI PTA	Makahiki Closing Ceremony
2/5/2024	USARPAC, USAG-HI PTA	PTA Site Visit, Board of Land and Natural Resources Members, Ms. Doreen Napua Canto and Ms. Karen Ono
2/6/2024	USAG-HI	Ka'ala Service Project
2/6/2024	USAG-HI	Piko Listening Journey at Kūkaniloko with Wahiaiwā Hawaiian Civic Club
2/6/2024	USARPAC, USAG-HI PTA	PTA Site Visit, Board of Land and Natural Resources Member, Mr. Vernon Char
2/8/2024	USAG-HI	Hawai'i Terrian Mitigation Working Group Meeting
2/8/2024	USAG-HI PTA	Adopt the Highway Service Project- DKI Highway
2/8/2024	USAG PTA	Hawai'i County Parks and Recreation Director Visit to PTA
2/9/2024	USAG-HI PTA, USARPAC	PTA Site Visit, Participants of the Kahoahoa Dialogue Sessions
2/10/2024	USAG-HI PTA, USARPAC, USARHAW	Kāhoahoa Dialogue Session, Wai Summit at UH-Hilo
2/10/2024	USAG-HI	Kahuā Service Project
2/12/2024	USARPAC, USAG-HI PTA	PTA Site Visit, Board of Land and Natural Resources Member, Mr. Riley Smith
2/14/2024	USAG-HI	Taping of Endangered Species Act Documentary
2/16/2024	USAG-HI	Ka'ala visit with USFWS visiting leadership, COL McGunegle hosted.
2/17/2024	USAG-HI	Pahole Service Project
2/22/2024	USAG-HI	Annual Integrated Natural Resources Management Plan meetings with federal, state and local natural resource partners. Ecosystem management focus.
2/24/2024	USARPAC	O'ahu Veterans Council Meeting, ATLR Briefing
2/24/2024	USAG-HI	Mālama Mākua Cultural Access
2/29/2024	USARPAC	Native Hawaiian Leaders Working Group Meeting

March		
Date	Command/Unit	Engagement
3/1/2024	USAG-HI	Mālama Mākua Cultural Access
3/1/2024	USARPAC	Presentation(s) “Hawai’i from the lens of a Kūpuna” by Thomas Kaulukukui Jr. and “King Kamehameha and the Battle of Nu’uanu Pali” by Moses Kaoiwi (BG Retired)
3/1/2024	OSD REPI, USAG-HI	FY24 REPI Challenge Discussion with the Office of Hawaiian Affairs (OHA)
3/2/2024	USAG-HI	Palikeya Service Project
3/7/2024	USAG-HI PTA	Hawai’i Island Watershed Partnership Meeting
3/8/2024	USAG-HI DPW ENV-NR	FWS Ko’olau Refuge Burn Restoration Planning
3/8/2024	USAG-HI	Consultation with Hawaiian Civic Club of Wahiawā at Wheeler
3/9/2024	USAG-HI	Kahanahāhiki Service Project
3/9/2024	USAG-HI	Koa ‘Ike Cultural Access at Mākua
3/10/2024	USAG-HI	Mālama Mākua Cultural Access
3/10/2024	USAG-HI	Engagement with Hawaiian Civic Club of Wahiawā at Kūkaniloko and OSD
3/11/2024	USAG-HI	Native Hawaiian Advisory Council Luncheon
3/12/2024	USAG-HI	Koa Mana consultation with Glen Kila at Ukanipo
3/13/2024	OSD REPI, USAG-HI	Kamananui-Kaukonahua Ranch Site Visit with REPI and Sentinel Landscapes
3/14/2024	USAG-HI PTA	Career Day at Kamehameha School Hawai’i Campus (Fire Fighter)
3/16/2024	USAG-HI	Ka’ala Service Project
3/16/2024	USAG-HI	Mākua Makahiki Closing Ceremony – Mālama Mākua Cultural Access (Overnight)
3/17/2024	USAG-HI DPW ENV	Annual Integrated Natural Resources Management Plan meetings with federal, state and local natural resource partners.
3/18/2024		
3/19/2024	USAG-HI	Kahuku Community Association Meeting
3/21/2024	USAG-HI	West Makaleha Service Project
3/21/2024	USARPAC	USARPAC and DLNR Leadership information briefing
3/25/2024	USARPAC, USARHAW, USAG-HI PTA	ATLR Briefing to the Hawai’i Island Caucus (Hawai’i Island State Legislators) at the State Capitol
3/27/2024	HQDA, USARPAC, USARHAW, USAG-HI	Settlement agreement consultation with Mālama Mākua
3/28/2024	USAG-HI PTA	Waikōloa Firewise Community Meeting
3/28/2024	USAG-HI	Consultation with Ka ‘Ohana Ho’ohuli regarding Kīpapa

<b>April</b>		
<b>Date</b>	<b>Command/Unit</b>	<b>Engagement</b>
<b>4/4/2024</b>	USAG-HI	Consultation with Hawaiian Civic Club of Wahiawa
<b>4/5/2024</b>	USAG-HI	Consultation with House of Nobles at AMR
<b>4/5/2024</b>	USAG-HI	Mālama Mākua Cultural Access
<b>4/11/2024</b>	USARPAC	Native Hawaiian Leaders Working Group Meeting
<b>4/12/2024</b>	USARPAC, USARHAW, USAG- HI, USAG-HI PTA	ATLR Briefing to the Board of Land and Natural Resources
<b>4/17/2024</b>	USAG-HI	Community Stakeholders Meeting/Social - South
<b>4/19/2024</b>	USAG-HI, USARPAC	PTA Second Draft EIS is published
<b>4/20/2024</b>	USAG-HI	Mālama Mākua Cultural Access
<b>4/20/2024</b>	USAG-HI PTA	Hawai'i County American Legion Meeting (USO)
<b>4/24/2024</b>	USAG-HI	Editorial Board Meeting with Star Advertiser
<b>4/25/2024</b>	USAG-HI PTA	Waikōloa Firewise Community Meeting
<b>4/25/2024</b>	USAG-HI PTA	Experience PTA Day
<b>4/25/2024</b>	USAG-HI	Native Hawaiian Advisory Council Meeting
<b>4/25/2024</b>	USAG-HI, USARPAC, USARHAW	Wai'anae Moku Kūpuna Council with REP Tokuda, MG Bartholomees, COL Garcia, COL McGunegle at Mākua
<b>4/25/2024</b> – <b>4/29/2024</b>	USAG-HI PTA	41st Annual National Fish and Wildlife Association Meeting
<b>4/26/2024</b>	USAG-HI	Consultation with Kāpele Ohana at PTA
<b>4/26/2024</b>	USAG-HI PTA	Spring Native Hawaiian Listening Session at PTA
<b>4/27/2024</b>	USAG-HI	BOSS Beach Cleanup at Mokulē'ia Beach
<b>4/29/2024</b> – <b>5/3/2024</b>	USAG-HI PTA	Wildland Fire Fighter Training S-190, S130 with Hawai'i County Fire Department
<b>4/30/2024</b>	USAG-HI PTA	Hawaiian Island Chamber of Commerce Community Meeting
<b>4/30/2024</b>	USAG-HI	Community Stakeholders Meeting/Social - North

<b>May</b>		
<b>Date</b>	<b>Command/Unit</b>	<b>Engagement</b>
5/1/2024	USARPAC	ATLR Delivery of PTA DEIS Informational Packets to State Legislators
5/1/2024	USAG-HI DFMWR	Installation Volunteer Award Ceremony @ 604 Ale House SB
5/2/2024	USARPAC, USAG-HI, USAG-HI PTA	ATLR PTA Second Draft EIS Agency Meeting
5/2/2024	USAG-HI PTA	Waimea Community Association Meeting
5/3/2024	USAG-HI PTA	Hawai'i Sustainability Summit
5/3/2024	USAG-HI PTA	Kona-Kohala Chamber of Commerce Meeting
5/3/2024	USAG-HI	Community Stakeholders Meeting/Social - West
5/4/2024	USAG-HI	Mālama Mākua Cultural Access
5/6/2024	USAG-HI, DPW-ENV	Honouliuli Forest Reserve Advisory Committee
5/6/2024	USAG-HI, USAG-HI PTA, USARPAC	PTA DEIS Public Meeting – Waimea District Park, Waimea
5/7/2024	USAG-HI, USAG-HI PTA, USARPAC	PTA DEIS Public Meeting – 'Imiloa Astronomy Center, Hilo
5/10/2024	USAG-HI PTA	Special Forces Association Award Ceremony (Hilo JROTC)
5/10/2024	USAG-HI	Consultation meeting with the National Park Service
5/10/2024	USAG-HI DPW-ENV	USAG-HI employee received Governor's invasive species hero award.
5/11/2024	USAG-HI	Cultural Access by Koa Mana/Alika Silva at PARC
5/12/2024	USAG-HI	Mālama Mākua Cultural Access
5/13/2024	USAG-HI	Consultation meeting with Aha Kūkaniloko and House of Nobles
5/14/2024	USAG-HI PTA	Wildfire Preparedness Learning Series for Large Landowner/Stewards Meeting (County Fire Department/DLNR)
5/16/2024	USAG-HI PTA	DLNR Nāpu'u partners visit to PTA
5/19/2024	USAG-HI	Consultation/Cultural Access with Ka 'Ohana Ho'ohuli at Ka'ala
5/20/2024 – 5/22/2024	USARPAC, USAG-HI	Hawai'i Executive Collaboration Meeting/Workshop
5/21/2024	USAG-HI	Kahuku Community Association Meeting
5/23/2024	USAG-HI PTA	Waikōloa Firewise Community Meeting
5/25/2024	USAG-HI PTA	Memorial Day Ceremony Puna Honwangji Speaking Engagement (CDR)
5/27/2024	USAG PTA	KMC Memorial Day Ceremony Event (CDR)
5/30/2024	USARPAC	Gen Flynn meeting with community leader regarding ATLR
5/30/2024	USARPAC	Asian American Native Hawaiian Pacific Islander Heritage (AANHPIH) Month Celebration
5/31/2024	USARPAC	USARPAC Leadership ATLR Briefing with State Leadership
5/31/2024	USARPAC	House Armed Services Committee STAFFDEL ATLR Briefing

June		
Date	Command/Unit	Engagement
6/7/2024	USAG-HI, USARPAC	Publication of Oahu DEIS
6/8/2024	HQDA, USARPAC	Hui Kiolo: Wai‘anae Moku Kūpuna Council Pentagon Meetings
6/10/2024	USARPAC	Meeting with Laurie Moore and John Greene, DBEDT Military and Community Relations Office
6/11/2024	USAG-HI	Engagement with Hawaiian Civic Club of Wahiawā and ASD Brendan Owens
6/12/2024	USAG-HI	Meeting with DLNR SHPD Staff and DLNR Chair Dawn Chang
6/13/2024	USARPAC	Ko‘olauloa Neighborhood Board Meeting - ATR
6/14/2024	USARPAC	ATR Delivery of O‘ahu DEIS Informational Packets to State Legislators
6/17/2024	USARPAC	Wahiawā-Whitmore Village Neighborhood Board Meeting - ATR
6/17/2024 – 6/21/2024	USAG-HI PTA	Multiple Fire Fighter Training with 297th Engineer Det
6/18/2024	USAG-HI PTA	Mauna Kea Watershed Alliance Partnership Meeting
6/18/2024	USARPAC	Nānākuli-Mā‘ili Neighborhood Board Meeting - ATR
6/18/2024	USARPAC	ATR Delivery of O‘ahu DEIS Informational Packets to County and Congressional Representatives
6/20/2024	USAG-HI PTA	PTA access for Stewardship /Summer Solstice Cultural Ceremony at Pu‘u Koli with Kalani Flores
6/21/2024	USARPAC	Congressional STAFFDEL ATR Briefing
6/21/2024	USAG-HI PTA	STAFFDEL Army Caucus site visit to PTA
6/24/2024	USAG-HI	Consultation meeting with ‘Aha Kūkaniloko
6/25/2024	USARPAC	North Shore Neighborhood Board Meeting - ATR
6/26/2024	USARPAC, USAG-HI PTA	PTA Site Visit, Board of Land and Natural Resources Member, Ms. Aimee Barnes
6/27/2024	USAG-HI PTA	Waikōloa Firewise Community Meeting
6/28/2024	USAG-HI PTA	PTA firefighters taught basic Fire Fighting Skills with Ho‘omau Fire Academy
6/30/2024	USAG-HI	Mālama Mākua Cultural Access

<b>July</b>		
<b>Date</b>	<b>Command/Unit</b>	<b>Engagement</b>
7/2/2024	USARPAC	Wai‘anae Coast Neighborhood Board Meeting - ATLR
7/2/2024 – 7/31/2024	USAG-HI PTA	REPI Display at the Thelma Parker Memorial Public and School Library in Waimea
7/3/2024	USAG-HI	Mālama Mākua Cultural Access
7/5/2024	USAG-HI	Consultation with Hawaiian Civic Club of Wahiawā
7/5/2024	USAG-HI	GC Press Conference with Governor Green Regarding Kawaihāpai Airfield Lease Extension Agreement
7/6/2024	USAG-HI	Mālama Mākua Cultural Access
7/9/2024	USAG-HI, USARPAC	O‘ahu DEIS Public Comment Meetings – Wai‘anae District Park
7/10/2024	USARPAC, USAG-HI	Mayor Rick Blangiardi ATLR Briefing
7/10/2024	USAG-HI, USARPAC	O‘ahu DEIS Public Comment Meetings – Kahuku High and Intermediate School
7/10/2024	USAG-HI	Kūpuna Council of Dr. Agnes Kalaniho'okaha Cope Traditional Native Hawaiian Healing Center/Wahiawā Hawaiian Civic Club/Ho‘oulu Na Mamo Summer Program visit to Kolekole Stone and the Natural and Cultural Resources Office at Schofield – hosted by BG (Ret.) Moses Kaiwi
7/11/2024	USAG-HI, USARPAC	O‘ahu DEIS Public Comment Meetings – Leilehua High School
7/12/2024	USAG-HI DPW-ENV	Halemanō Wilderness Area Working Group; community and agency invited attendance.
7/13/2024	USAG-HI	Talk-story with Mālama Mākua /COL Sullivan
7/16/2024	USARPAC	Water & Geothermal Briefing by Dr. Don Thomas and UH-Hilo Researchers
7/16/2024 7/17/2024	USAG-HI PTA	SCBA technician classes hosted by Hilo Fire Department ICW with PTA Fire Dept- training 4 of PTA Fire Fighters
7/17/2024	USAG-HI DPW-ENV	OLDCC-UH kick off meeting for biocontrol/biosecurity and wildland fire planning grant.
7/19/2024	USAG-HI PTA	South Kohala Coastal Partnership All Partners Gathering
7/19/2024	USAG-HI	Stewardship access visit with ‘Aha Kūkaniloko, House of Nobles, at SBW.
7/23/2024	USAG-HI	Kahuku Community Association Meeting
7/24/2024	USAG-HI PTA	REPI Webinars- 2024 Designation Cycle Sentinel Landscapes
7/25/2024	USAG-HI PTA	Waikōloa Firewise Community Meeting
7/25/2024	USINDOPACOM, USARPAC	Meeting with BLNR Chair Dawn Chang USINDOPACOM
7/26/2024	USARPAC	Pacific Resource Partnership (PRP) Partners for Democracy web seminar panel discussion focused on the economics of Hawai‘i and the supporting key three pillars—Tourism, Military, and Construction
7/30/2024	USARPAC	USARPAC CoS and ATLR PM Executive Branch Meeting
7/30/2024 – 8/1/2024	USAG-HI, USAG-HI PTA	31 <sup>st</sup> Annual Hawai‘i Conservation Conference

<b>August</b>		
<b>Date</b>	<b>Command/Unit</b>	<b>Engagement</b>
<b>8/1/2024</b>	USAG-HI, DHR, TAP	Medal of Honor recipient Dakota Meyer visit to various units to promote the 2024 Hawaii Career Summit.
<b>8/5/2024</b>	USAG-HI DPW-ENV	Pathways interns start work. Interns shared with USAG-HI Natural Resources, USFWS Refuges and University of Hawaii's Lyon Arboretum.
<b>8/6/2024</b>	USARPAC, USAG-HI, USAG-HI PTA	Hawai'i Chamber of Commerce Military Affairs Council (MAC) Bi-Annual State of the Indo-Pacific
<b>8/8/2024</b>	USAG-HI	Consultation with Kawaihāpai 'Ohana at DMR
<b>8/9/2024</b>	USAG-HI PTA	Military Affairs Council (MAC) visit to PTA
<b>8/13/2024</b> – <b>8/15/2024</b>	USAG-HI PTA	PTA Fire Department teaching Auto extrication methods with Kona Fire Department
<b>8/14/2024</b>	USARPAC	Moanalua Valley Community Meeting
<b>8/14/2024</b>	USARPAC	Water & Geothermal Briefing by Dr. Don Thomas and UH-Hilo Researchers
<b>8/19/2024</b>	USARPAC	ATLR Briefing/Meeting with DLNR 'Aha Moku Advisory Committee Executive Director, Leimana DaMate
<b>8/19/2024</b>	USAG-HI	Engagement with Wai'anae Kūpuna Network and DoD Senior Tribal Liaison at Mākua
<b>8/20/2024</b> – <b>8/22/2024</b>	USINDOPACOM USARPAC, USARHAW, USAG-HI	DoD Native Hawaiian Cultural Communications and Consultation Course
<b>8/21/2024</b>	USARPAC	Native Hawaiian Leaders Working Group Meeting
<b>8/24/2024</b>	USAG-HI	Mālama Mākua Cultural Access
<b>8/27/2024</b>	USARPAC, USARHAW, USAG-HI	Congresswoman Jill Tokuda O'ahu Lands Site Visits / Aerial Tour
<b>8/28/2024</b>	USARPAC, USARHAW, USAG-PTA	Congresswoman Jill Tokuda PTA Site Visit

<b>September</b>		
Date	Command/Unit	Engagement
9/4/2024	USARPAC, USARHAW, USAG-HI/PTA	Kāhoahoa Meeting
9/7/2024	USAG-HI	Protect & Preserve HedGar ICA Check/ Ka’ala Volunteer Trip
9/10/2024	USAG-HI	Mākaha Volunteer Trip
9/11/2024	USAG-HI	Moanalua Valley Community Association Meeting
9/14/2024	USAG-HI	Mālama Mākua Cultural Access
9/16/2024	OSD REPI	REPI Sync with University of Hawai’i on future opportunities
9/18/2024	USAG-HI	Native Hawaiian Advisory Council Luncheon (NHAC)
9/19/2024	USAG-HI	Engagement with Waianae Moku Kūpuna Council, Mālama Mākua, BG Okamura, COL Sullivan regarding planting proposals at MMR.
9/21/2024	USAG-HI DFMWR	Mauna Kea Watershed Alliance Partners Meeting

<b>October</b>		
Date	Command/Unit	Engagement
10/2/2024 – 10/5/2024	USINDOPACOM, USARPAC	2024 Annual Hawaii Executive Conference
10/3/2024	USARPAC	ATLR Information briefing with Governor Green Staff
10/3/2024	OSD REPI	Kūkaniloko REPI Project Site Visit included the following: OSD REPI; USAG HI; Rep Ed Case Staff, Office of Hawaiian Affairs, Hawaiian Civic Club of Wahiawā, University of Hawai’i
10/9/2024	USINDOPACOM USARPAC, USARHAW, USAG-HI/PTA	Kāhoahoa Meeting
10/9/2024	USAG-HI	Introduction to Hawai’i Conservation Workshop with Mililani High School Students
10/12/2024	USAG-HI	National Public Land’s Day (NPLD) Native Hawaiian Interpretive Garden Renovation
10/15/2024	USARPAC	ATLR Meeting – Leimana DaMate (Aha Moku Council)
10/16/2024	USACE	Restoration Advisory Board (RAB) for former Waikōloa Manuever Area at Mānā Christian ‘Ohana in Waimea
10/17/2024	USARPAC	ATLR Meeting – OHA Trustees: Kaiali’i Kahele (Hawaii Island), Brickwood Galuteria (At-Large) and Keoni Souza (At-Large)
10/18/2024	USARPAC	ATLR information briefing – Mehana Hind (CNHA)
10/23/2024 – 10/24/2024	USAG-HI	Ka’ala Volunteer Trip with veteran volunteers
10/26/2024	USAG-HI	Ka’ala Volunteer Trip with Mililani High School Hui Mālama
10/28/2024	USINDOPACOM USARPAC	Briefing for Congressman Case and GOV Green with Senior Leaders of the Military

<b>November</b>		
<b>Date</b>	<b>Command/Unit</b>	<b>Engagement</b>
<b>11/1/2024 – 11/3/2024</b>	USAG-HI	Mālama Mākua Cultural Access: Celebration of the 20 years of no live fire at MMR
<b>11/2/2024</b>	USAG-HI	Palikea Volunteer Trip with Hawai'i Pacific University students
<b>11/5/2024</b>	USINDOPACOM, USARPAC, USAG-HI/PTA	Kahoahoa – “Legal & Political History” Working Group Meeting
<b>11/6/2024</b>	USAG-HI	Community Visits with State Rep. Amy Perruso: East Range, Wahiawa Middle School & Leilehua Golf Course
<b>11/6/2024</b>	USARPAC	ATLR Meeting – John Aeto (The Kalaimoku Group)
<b>11/6/2024</b>	USINDOPACOM, USARPAC, USAG-HI/PTA	Kahoahoa – “Cultural Sites & Stewardship” Working Group Meeting
<b>11/9/2024</b>	USINDOPACOM, USARPAC, USAG-HI/PTA	Kahoahoa – “Wai” Working Group Meeting
<b>11/12/2024 11/13/2024</b>	USAG-HI	Kolekole Pass TTX (Tabletop Exercise) - Comprehensive tabletop exercise with county and state emergency services
<b>11/13/2024</b>	USINDOPACOM, USARPAC, USAG-HI/PTA	Kahoahoa – “Education & Community Engagement” Working Group Meeting
<b>11/17/2024</b>	USAG-HI PTA	Makahiki Ceremony at Pōhakuloa Training Area
<b>11/20/2024</b>	USAG-HI	Mākaha Volunteer Trip
<b>11/20/2024</b>	USINDOPACOM, USARPAC, USAG-HI/PTA	Kahoahoa – “Access” Working Group Meeting
<b>11/23/2024 11/24/2024</b>	USAG-HI	Mālama Mākua Cultural Access – Makahiki (overnight)
<b>11/26/2024</b>	USAG-HI	UH Natural Resource Ecosystem Management (NREM) Presentation

December		
Date	Command/Unit	Engagement
12/3/2024	USINDOPACOM USARPAC	Hawai'i State Legislature Visit to USINDOPACOM
12/4/2024	USAG-HI	Ka'ala Volunteer Trip with students from Wai'anae Intermediate School
12/4/2024	USINDOPACOM, USAG-HI PTA	Institute For Defense Analyses/ Hawaii Economic Impact Study Meeting
12/7/2024	USAG-HI	Mālama Mākua Cultural Access
12/10/2024	USAG-HI	Kalua'a Volunteer Trip
12/11/2024	USINDOPACOM, USARPAC, USAG-HI/PTA	Kahoahoa – "Cultural Sites & Stewardship" Working Group Meeting
12/11/2024	USINDOPACOM, USARPAC, USAG-HI/PTA	Kahoahoa – "Education & Community Engagement" Working Group Meeting
12/11/2024	USAG-HI	Native Hawaiian Advisory Council Meeting
12/13/2024	USARPAC	ATLR Briefing for Mr. Kali Watson (DHHL Director/Chairman) and Staff
12/17/2024	USAG-HI	Kahanahāiki Volunteer Trip
12/29/2024	USAG-HI	Mālama Mākua Cultural Access

2024 Other Community Coordination/Outreach		
Date	Command/Unit	Engagement
Monthly	USARPAC, USARHAW, USAG-HI	'Ohana Partner Network – Neighborhood Board Meetings Brigade-level leaders are liaisons with 10 key community neighborhood boards.
Aug 2023 – Present	USACE Recovery Field Office Maui	Maui Wildfires Response & Recovery efforts; debris removal ISO County of Maui, FEMA, State of Hawai'i; provided temp power; built temp school; overseeing design & construction of temp housing site (Kilohana).
Every Monday	USACE Recovery Field Office Maui	Mayor's (Maui County) Advisory Council meetings: includes RFO Commander LTC Collin Jones, Mayor Bissen, and various other advisors
Every Wednesday	USACE Recovery Field Office Maui	Lahaina Community Meeting: includes RFO Commander LTC Collins Jones, RFO staff, and Lahaina community.
SEP-DEC	USAG-HI	Movers and Shaka Cohort 6 (Fall 2024) Member COL Rachel Sullivan – 6 Week Program which participants learn about local culture, Hawaiian history and communication/leadership styles in Hawai'i.
SEP-OCT	U.S. Army Museum of Hawai'i	Kukalepa Memorial Refurbishment Project at the U.S. Army Museum of Hawai'i at Fort DeRussy
SEP-OCT	USAG-HI	Army partners with Hui Mahi'ai 'Āina, a nonprofit to help prepare and maintain gardens, ensuring the land remains a viable resource for community members and a testament to sustainability in agriculture

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